

SR-710

SURPLUS PROPERTY SALES

FINAL ENVIRONMENTAL IMPACT REPORT



PREPARED BY THE
STATE OF CALIFORNIA
DEPARTMENT OF TRANSPORTATION



JULY 2016

This page intentionally left blank

SR-710 Surplus Property Sales

Final Environmental Impact Report

LOS ANGELES COUNTY, CALIFORNIA
CALTRANS, DISTRICT 7
SCH No. 2014071006

**Prepared by the
State of California Department of Transportation**



July 2016

This page intentionally left blank

Sale of State-owned parcels deemed excess in Los Angeles County.

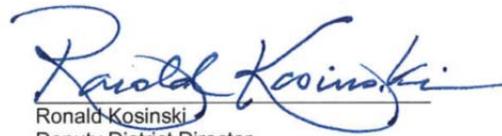
**SR-710 SURPLUS PROPERTY SALES
FINAL ENVIRONMENTAL IMPACT REPORT**

Submitted Pursuant to: (State) Division 13, California Public Resources Code

THE STATE OF CALIFORNIA
Department of Transportation

Responsible Agency: California Transportation Commission

July 28, 2016
Date of Approval


Ronald Kosinski
Deputy District Director
Division of Environmental Planning
District 7
California Department of Transportation

The following person may be contacted for more information about this document:
Garrett Damrath
Chief Environmental Planner, Division of Environmental Planning
California Department of Transportation
100 South Main Street, MS 16A
Los Angeles, CA 90012

This page intentionally left blank

Summary

This documentation for the State Route 710 (SR-710) Surplus Property Sales has been prepared in compliance with the California Environmental Quality Act (CEQA). For the proposed action, the California Department of Transportation (Caltrans) is the action proponent and lead agency under CEQA. This section summarizes the characteristics of the proposed SR-710 Surplus Property Sales in Los Angeles County.

S.1 Overview of the Action Area

More than 50 years ago, when the proposal for the SR-710 “Meridian Route” was first introduced, Caltrans began to acquire single-family residences, multifamily residences, businesses, and vacant lots in the Cities of Los Angeles, Pasadena, and South Pasadena in Los Angeles County.

The action area for the SR-710 Surplus Property Sales, as depicted on Figure 1-2 in Chapter 1, is generally bounded to where the original proposed surface freeway alignment would have connected Interstate 710 (I-710) to Interstate 210 (I-210). The action area can be characterized as urban and is considered primarily built out, with very little vacant land available for new development.

S.2 Purpose and Need

Purpose

This action intends to offer the surplus properties that are not impacted by the project alternatives being evaluated in the SR-710 North Study Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS)¹ to housing entities, previous

¹ California Department of Transportation (Caltrans), District 7 and the Los Angeles County Metropolitan Transportation Authority. SR-710 North Study Draft Environmental Impact Report/Environmental Impact Statement and Draft Section 4(f) De Minimis Findings, Volume 1, March 2015, http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/SR%20710%20No.%20Study%20Draft%20EIR_EIS%20Vol%20I%20Rpt.pdf, accessed July 2, 2015.

owners, current tenants and occupants, former tenants, and persons and families of low or moderate income pursuant to Senate Bill (SB) 416 and the Roberti Bill. The action is also intended to provide needed affordable housing in the subject area and remove Caltrans from its property management role with these properties.

Need

The Caltrans need for the proposed SR-710 Surplus Property Sales includes complying with SB 416, the Roberti Bill, the Affordable Sales Program (ASP), and the Streets and Highways Code.

S.3 Description of Proposed Action

Caltrans currently holds the deeds to 460 properties in the Cities of Pasadena and South Pasadena, and in the El Sereno area of the City of Los Angeles. Once the properties are identified as being no longer necessary for the project alternatives in the SR-710 North Study, they will be declared excess pursuant to Streets and Highways Code Section 118 (the terms “excess” and “surplus” are used interchangeably throughout this Environmental Impact Report [EIR]). According to the SR-710 North Study Relocation Impact Report (October 2014),¹ three state owned parcels are within the scope of the alternatives. The sale of surplus residential properties is planned in the following three phases:

1. **Phase 1:** Properties that are not within the scope of the remaining project alternatives for the SR-710 North Study:
 - a. **Phase 1A:** Single-family residences that Caltrans has determined to be non-historic and would not result in any community impact.
 - b. **Phase 1B:** All other residential properties that are not within the scope of the remaining alternatives for the SR-710 North Study.
2. **Phase 2:** Properties that are within the scope of the remaining project alternatives of the SR-710 North Study but can still be sold.

¹ California Department of Transportation (Caltrans), District 7 and the Los Angeles County Metropolitan Transportation Authority. SR-710 North Study Relocation Impact Report, October 2014, http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/Relocation%20Impact%20Report/SR%20710%20Relocation%20Impact%20Report.pdf, accessed July 2, 2015.

3. **Phase 3:** Properties declared surplus after the completion of the approved preferred project alternative in the SR-710 North Study.

Caltrans may offer to sell the vacant lots pursuant to Streets and Highways Code Section 118.6, which allows properties to be offered by auction, sealed or continuous bid to the public, or by a sale or exchange to public agencies. Any improved property or property with a tenant will be sold through the ASP regulations, Roberti Bill, and SB 416.

S.4 Alternatives

Alternative 1 – No Action (No Sale) Alternative

Alternative 1 assumes the proposed sales will not be adopted or implemented. Caltrans would retain ownership of the properties and would continue to make them available for rent throughout the Cities of Pasadena, South Pasadena, and Los Angeles. No change in environmental conditions would occur under Alternative 1 because the proposed sale would not take place. However, under Alternative 1, Caltrans would be in violation of Streets and Highways Code Section 118, which mandates that the agency sell properties it no longer needs for highway purposes.

Alternative 2 – Action Alternative

Alternative 2 assumes the proposed sale is implemented and will consist of selling surplus parcels that are no longer needed for the SR-710 North Study, pursuant to Streets and Highways Code Section 118.6, the Roberti Bill, SB 416, and ASP regulations. Alternative 2 consists of two variations (Variations A and B), each with two options (Variation A Options 1 and 2, and Variation B Options 1 and 2) and it is anticipated that both variations will meet the action's purpose and need. Under Variations A and B, the proceeds from the sale of surplus properties, sold per ASP regulations, will be allocated to the SR-710 Rehabilitation Account for the rehabilitation of surplus single-family homes being sold to low- and moderate-income occupants for which lenders or government housing assistance programs require repairs.

- **Variation A Options 1 and 2.** Variation A assumes that the action is adopted and implemented. However, under Variation A, the action would consist of selling surplus parcels over a 5-year period. Given that the range of alternatives currently under study in the SR-710 North Study DEIR/DEIS do include a subterranean tunnel (the Freeway Tunnel Alternative), two options for each sale variation are being presented that pertain to subsurface property rights. Under Variation A

Option 1, the properties would be sold over the 5-year period as proposed, but subsurface rights to a tunnel easement would be retained by Caltrans. Under Variation A Option 2, all subsurface property rights would be conveyed with the properties. In the event the SR-710 North Study Freeway Tunnel Alternative is selected for implementation, Caltrans would at that time acquire any necessary subsurface easements through the standard right-of-way acquisition process.

- **Variation B Options 1 and 2.** Variation B consists of selling surplus parcels all at once. The parcels deemed to be surplus will be put on the market simultaneously for sale as soon as practicable rather than spaced over the 5-year period. Variation B also includes Options 1 and 2, which pertain to subsurface property rights. Variation B Option 1 would immediately sell the parcels deemed to be surplus while retaining subsurface rights to a tunnel easement. Variation B Option 2 would convey all subsurface property rights with the parcels. In the event the SR-710 North Study Freeway Tunnel Alternative is selected for implementation, Caltrans would at that time acquire any necessary subsurface easements through the standard right-of-way acquisition process.

Based on the results of environmental analysis and comments received on the Draft Environmental Impact Report (DEIR), and deliberation by the Project Development Team, Alternative 2 Variation A Option 1 has been identified as the Preferred Alternative.

S.5 Environmental Analysis

A list of potential impacts from the No Action Alternative and the proposed Action Alternative is summarized in Table S.1.

S.6 Areas of Controversy and Unresolved Issues

Based on public input received during scoping in late summer of 2014 and the comments received during public circulation of the DEIR, the following summary of public concerns is provided:

- Concerns regarding the environmental effects of the proposed sales on the affected communities, the primary concerns of which have been hazardous waste and effects on historic properties.
- Community demographics concerning potential relocations.

Table S.1 Summary of Potential Impacts from Alternatives

Issue Area	Potential Impact by Alternative		Avoidance, Minimization, and/or Mitigation Measures
	No Action	Action Alternative (All Variations)	
Land Use	Inconsistencies would exist until the Pasadena and South Pasadena General Plans and the Mission Street Specific Plan are amended to reflect that the surplus properties will not be sold. A potentially significant impact would occur until the inconsistencies are resolved.	No Impact	LU-1 Alternative 1 would result in inconsistencies with local jurisdictions' General Plans and/or other location land use plans. If Alternative 1 is selected for implementation, the California Department of Transportation (Caltrans) will request applicable local jurisdictions to amend their General Plans and/or other local land use plans to reflect that the surplus properties would not be sold. However, because Caltrans has no authority to require a General Plan amendment, a significant unavoidable impact would remain until the General Plans are amended.
Community Factors	No Impact	There is a possibility that community character may be altered due to displacements and the subsequent new owners taking residence.	The ASP regulations process is happening concurrently with this EIR process and is striving to ensure that those tenants who desire to purchase their single-family homes will be afforded every possible opportunity to do so.
Relocations	No Impact	There are 148 households anticipated to be displaced.	R-1 To increase the potential for occupants to obtain financing to purchase, and thereby avoid and minimize the number of people displaced, the California Department of Transportation (Caltrans) is working with the California Housing Finance Agency to make more financing products available to prospective buyers than are currently readily available in the general lending market. Occupants who do not purchase will be provided advisory assistance to find and relocate to comparable housing, and Caltrans will seek assistance from agencies such as the United States Department of Housing and Urban Development (HUD) to find affordable housing.
Growth	No Impact	No Impact	No avoidance, minimization, and/or mitigation measures are required.
Cultural Resources	No Impact	There are 113 historical resources. There are 75 properties in the City of Pasadena, 13 properties in the City of South Pasadena, and 10 properties in the City of Los Angeles that are listed in or determined eligible for listing in the	CR-1 Consultation with responsible historic preservation organizations, subject local agencies, and the State Historic Preservation Officer (SHPO) will result in the development of historic covenants or other agreements to protect the historic character and significant features of the National Register of

Table S.1 Summary of Potential Impacts from Alternatives

Issue Area	Potential Impact by Alternative		Avoidance, Minimization, and/or Mitigation Measures
	No Action	Action Alternative (All Variations)	
		National Register. Fifteen (15) properties in South Pasadena are CEQA-only resources. Historic properties will be sold with protective covenants in place that will avoid impacts to cultural resources.	<p>Historic Places (National Register) listed or determined eligible for listing properties. These protective measures will be executed and filed appropriately as the properties are sold and new owners are identified. Agreements to protect historical resources will be enforceable by way of third-party monitoring by a non-profit organization. Any potential impacts to cultural resources would be avoided under these protective measures, which will be held in perpetuity.</p> <p>CR-2 The California Department of Transportation (Caltrans) will provide a one-time monetary payment, a stewardship fee, to ensure that the qualified organization will have the financial support for the continued monitoring of the historic covenants or other protective measures as agreed.</p>
Hazardous Waste	No Impact	Based on the general age of all the surplus properties (residential and commercial), it is likely that asbestos-containing materials and lead-based paint may be present within the painted surfaces of the buildings. In addition, other common items are present in the buildings, such as fluorescent lighting, electrical switches, heating/cooling equipment, and thermostats that can contain hazardous waste materials, which may pose a health risk if not handled and disposed of properly	<p>HW-1 A qualified contractor will conduct Initial Site Assessment (ISA) investigations at Parcel Nos. 14135 and 61314 prior to their being sold. Further testing (Phase II Environmental Site Assessment) may be required based on the findings of the ISA, but the parcels will be held until further investigation and testing can be completed and, if necessary, remediation/mitigation can occur.</p> <p>HW-2 Each buyer will receive a pamphlet entitled "Protect Your Family From Lead In Your Home" and be required to sign a Disclosure of Information on Lead-Based Paint and Lead-Based Paint Hazards Form.</p>
Cumulative	Land Use: Potentially could contribute to a cumulative impact		Measure LU-1 provided above under Land Use.

Source: Caltrans (July 2015)
 ASP = Affordable Sales Program
 Caltrans = California Department of Transportation
 CEQA = California Environmental Quality Act

EIR = Environmental Impact Report
 ISA = Initial Site Assessment
 National Register = National Register of Historic Places

SHPO = State Historic Preservation Officer

The proposed action as assessed in this Final EIR would result in potentially significant impacts on the environment. Mitigation measures have been developed as part of the impact analyses to fully offset impacts to a level of insignificance. There are no unresolved impacts that would require preparation and approval of a Statement of Overriding Considerations.

This page intentionally left blank

TABLE OF CONTENTS

SUMMARY	S-1
TABLE OF CONTENTS	TOC-i
LIST OF FIGURES	TOC-v
LIST OF TABLES	TOC-vii
LIST OF ACRONYMS AND ABBREVIATIONS	TOC-ix
CHAPTER 1 PROPOSED ACTION	1-1
1.1 Action Description	1-1
1.1.1 Action Background	1-1
1.2 Purpose and Need	1-8
1.2.1 Purpose	1-8
1.2.2 Need	1-8
1.3 Overview of Proposed Action	1-8
1.4 Permits and Approvals Needed	1-13
1.5 Uses of This Environmental Impact Report	1-49
CHAPTER 2 ALTERNATIVES	2-1
2.1 Alternative 1 – No Action (No Sale) Alternative	2-1
2.2 Alternative 2 – Action Alternative	2-1
2.2.1 Variation A – Sale Over 5-Year Period	2-2
2.2.2 Variation B – Immediate Sale	2-3
2.3 Alternatives Considered but Not Analyzed in Detail	2-4
2.4 Environmentally Preferred Alternative	2-4
CHAPTER 3 ENVIRONMENTAL SETTING	3-1
3.1 Regional and Local Setting	3-1
3.2 Area and Local Plans	3-3
3.2.1 Local Agency Plans	3-4
CHAPTER 4 ENVIRONMENTAL ANALYSIS	4-1
4.1 Land Use	4-3
4.1.1 Existing Conditions	4-3
4.1.2 Regulatory Requirements	4-55
4.1.3 Significance Criteria	4-56
4.1.4 Impacts	4-57
4.1.5 Avoidance, Minimization, and/or Mitigation Measures	4-59
4.1.6 Level of Significance After Mitigation	4-62
4.2 Community Factors	4-62
4.2.1 Community Demographics and Character	4-62
4.2.2 Relocations and Real Property Acquisition	4-69
4.2.3 Growth	4-73
4.2.4 Environmental Justice	4-77
4.3 Cultural Resources	4-81
4.3.1 Regulatory Requirements	4-81
4.3.2 Existing Conditions	4-82
4.3.3 Significance Criteria	4-84
4.3.4 Impacts	4-84
4.3.5 Avoidance, Minimization, and/or Mitigation Measures	4-112
4.3.6 Level of Significance After Mitigation	4-113
4.4 Hazardous Waste/Materials	4-113
4.4.1 Regulatory Requirements	4-113

4.4.2	Existing Conditions	4-114
4.4.3	Significance Criteria.....	4-129
4.4.4	Impacts	4-129
4.4.5	Avoidance, Minimization, and/or Mitigation Measures.....	4-130
4.4.6	Level of Significance After Mitigation	4-130
CHAPTER 5	OTHER TOPICAL CEQA ISSUES	5-1
5.1	Greenhouse Gas Emission and Climate Change	5-1
5.1.1	Regulatory Setting.....	5-2
5.1.2	CEQA Conclusion.....	5-3
5.2	Cumulative Impacts.....	5-4
5.2.1	Regulatory Requirements.....	5-4
5.2.2	Methodology	5-4
5.2.3	Resources Excluded from Cumulative Impact Analysis	5-5
5.2.4	Resources Evaluated for Cumulative Impact Analysis	5-14
5.3	Sustainability	5-33
5.4	Determining Significance under CEQA.....	5-34
5.4.1	Unavoidable Significant Environmental Effects	5-34
5.4.2	Mitigation Measures for Significant Impacts under CEQA	5-35
CHAPTER 6	REFERENCES	6-1
CHAPTER 7	COMMENTS AND COORDINATION.....	7-1
7.1	Scoping Process.....	7-1
7.1.1	Notice of Preparation	7-1
7.1.2	Comments Received During Scoping	7-1
7.2	Consultation and Coordination with Agencies.....	7-1
7.2.1	SHPO Consultation	7-1
7.2.2	City of Pasadena Consultation	7-2
7.2.3	City of South Pasadena Consultation	7-3
7.2.4	Community Outreach and Information Meetings.....	7-3
7.3	Distribution of the Draft Environmental Impact Report	7-4
7.3.1	Draft Environmental Impact Report Comment Period.....	7-4
7.3.2	Public Hearing.....	7-5
CHAPTER 8	DISTRIBUTION LIST	8-1
8.1	Tenants	8-1
8.2	Agencies.....	8-11
8.3	Other Interested Parties	8-11
8.4	Elected Officials.....	8-17
8.5	Libraries	8-19
CHAPTER 9	DOCUMENT PREPARATION TEAM.....	9-1
9.1	Lead Agency	9-1
9.1.1	California Department of Transportation, District 7	9-1
9.2	Consultants to Lead Agency.....	9-2
9.2.1	LSA Associates, Inc.	9-2
9.2.2	Tierra West Advisors	9-2
APPENDIX A	SENATE BILL 416	A-1
APPENDIX B	GOVERNMENT CODE 54235-54238.7 (ROBERTI BILL).....	B-1
APPENDIX C	TITLE VI POLICY STATEMENT	C-1
APPENDIX D	COMMENTS AND RESPONSES ON DRAFT ENVIRONMENTAL IMPACT REPORT	D-1

APPENDIX E ENVIRONMENTAL COMMITMENT RECORDE-1
APPENDIX F AFFORDABLE SALES PROGRAM REGULATIONS..... F-1
APPENDIX G LIST OF TECHNICAL STUDIES G-1
APPENDIX H STANDARDIZED REGULATORY IMPACT ASSESSMENT H-1
APPENDIX I NOTICE OF PREPARATION..... I-1
APPENDIX J SHPO CONCURRENCE.....J-1
APPENDIX K CEQA CHECKLIST K-1

This page intentionally left blank

LIST OF FIGURES

Figure 1-1 Regional Action Location Map.....	1-3
Figure 1-2 Proposed Action Study Area Map.....	1-5
Figure 1-3 Priorities of Prospective Buyers.....	1-11
Figure 1-4 Potential Surplus Properties	1-25
Figure 4-1 Existing Land Uses	4-5
Figure 4-2 General Plan Land Uses.....	4-31
Figure 4-3 Historical Resources on the Surplus Properties	4-93
Figure 4-4 Sites Containing Hazardous Material.....	4-117
Figure 4-5 Parcel No. 18497 Boring Locations	4-121
Figure 4-6 Parcel No. 3003 Boring Locations	4-123
Figure 4-7 Parcel No. 3008 Boring Locations	4-127
Figure 5-1 Cumulative Projects	5-7
Figure 5-2 Cumulative Projects – SR-710 North Study	5-9

This page intentionally left blank

LIST OF TABLES

Table 1.1 Summary of Sale Phases.....	1-9
Table 1.2 List of Potential Surplus Properties	1-14
Table 2.1 Number of Properties Estimated to be Sold Over 5-Year Implementation Period.....	2-2
Table 4.1 Existing Land Uses	4-3
Table 4.2 Plan Consistency Analysis for Alternative 1	4-58
Table 4.3 Plan Consistency Analysis for Alternative 2	4-60
Table 4.4 Community Demographic Indicators.....	4-65
Table 4.5 Anticipated Displacements	4-71
Table 4.6 Growth Trends in the Action Area.....	4-74
Table 4.7 City of South Pasadena CEQA Resources.....	4-85
Table 4.8 Historical Resources on the Surplus Properties	4-86
Table 4.9 Properties Containing Pole-Mounted Transformers	4-115
Table 5.1 Projects Included in Cumulative Impacts Analysis	5-11
Table 5.2 Parcels of Hazardous Waste Concern	5-32
Table 5.3 Mitigation Measures for Significant Impacts under CEQA.....	5-35

This page intentionally left blank

LIST OF ACRONYMS AND ABBREVIATIONS

5024 MOU	Memorandum of Understanding Between the California Department of Transportation and the California State Historic Preservation Officer Regarding Compliance with Public Resources Code 5024 and Governor's Executive Order W-26-92
2012 Audit	2012 Bureau of State Audits Report
AB	Assembly Bill
ADL	Aerially Deposited Lead
ac	acre/acres
ACS	American Community Survey
Alternative 1	No Action (No Sale) Alternative
Alternative 2	Action Alternative
ARB	California Air Resources Board
ASP	Affordable Sales Program
bgs	below ground surface
BRT	Bus Rapid Transit
Cal/EPA	California Environmental Protection Agency
CalHFA	California Housing Finance Agency
California Register	California Register of Historical Resources
CalSTA	California State Transportation Agency
Caltrans	California Department of Transportation
CalWETcitric	California Waste Extraction Test using citric acid
CCR	California Code of Regulations
CCRD	Caltrans Cultural Resources Database
Census Bureau	United States Census Bureau
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act of 1980

CERFA	Community Environmental Response Facilitation Act of 1992
CFR	Code of Federal Regulations
CH ₄	methane
CHRIS	California Historical Resources Information System
CIA	<i>Community Impact Assessment</i>
CLG	Certified Local Government
CO ₂	carbon dioxide
COC	Chemicals of Concern
County	County of Los Angeles
CTC	California Transportation Commission
cy	cubic yards
DEIR	Draft Environmental Impact Report
DEIS	Draft Environmental Impact Statement
DRIR	<i>Draft Relocation Impact Report</i>
EDR	Environmental Data Resources
EIR	Environmental Impact Report
EO	Executive Order
EPA	United States Environmental Protection Agency
FEIR	Final Environmental Impact Report
FHWA	Federal Highway Administration
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
ft	feet
GHG	greenhouse gas
HCD	California Department of Housing and Community Development
HFC-134a	s,s,s,2-tetrafluoroethane
HFC-152a	difluoroethane
HFC-23	fluoroform
HRCR	<i>Historic Resource Compliance Report</i>
HUD	United States Department of Housing and Urban Development

I-10	Interstate 10
I-210	Interstate 210
I-5	Interstate 5
I-605	Interstate 605
I-710	Interstate 710
IPCC	Intergovernmental Panel on Climate Change
IS	Initial Study
ISA	Initial Site Assessment
LRT	Light Rail Transit
Metro	Los Angeles County Metropolitan Transportation Authority
mg/L	milligrams per liter
mi	mile/miles
MND	Mitigated Negative Declaration
MPO	Metropolitan Planning Organization
N ₂ O	nitrous oxide
National Register	National Register of Historic Places
NEPA	National Environmental Policy Act of 1969
NOD	Notice of Determination
NOP	Notice of Preparation
OEE	Office of Environmental Engineering
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Act
PAL	Project Area Limits
PCBs	polychlorinated biphenyls
PQS	Professionally Qualified Staff
PRC	Public Resources Code
PUSD	Pasadena Unified School District
RAP	Relocation Assistance Program
RCRA	Resource Conservation and Recovery Act of 1976
ROD	Record of Decision
RSA	Resource Study Area
RTP	Regional Transportation Plan

RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SB 86	Roberti Bill
SCAG	Southern California Association of Governments
SCS	Sustainable Communities Strategy
SER	Standard Environmental Reference
sf	square feet
SF ₆	sulfur hexafluoride
SHPO	State Historic Preservation Officer
SI	Site Investigation
sq mi	square miles
SR-10	State Route 10
SR-110	State Route 110
SR-134	State Route 134
SR-2	State Route 2
SR-7	State Route 7
SR-710	State Route 710
SRIA	<i>Standardized Regulatory Impact Assessment</i>
STLC	California Soluble Threshold Limit Concentration
SVOC	semi-volatile organic compounds
TDM	Transportation Demand Management
TPH-D	total petroleum hydrocarbon diesel range
TPH-O	total petroleum hydrocarbon oil range
TSCA	Toxic Substances Control Act
TSM	Transportation System Management
TCLP	Toxicity Leaching Procedure
USC	United States Code
USTs	underground storage tanks
VOC	volatile organic compounds

Chapter 1 Proposed Action

1.1 Action Description

1.1.1 Action Background

In 1959, the State of California adopted its Master Plan of Freeways and Expressways and extended the planned State Route 7 (SR-7; now the State Route 710 [SR-710] and the Interstate 710 [I-710]) from its original Long Beach to Huntington Drive destination, northward to the Foothill Freeway, which is now Interstate 210 (I-210). In 1960, the cities of Alhambra, Los Angeles, Pasadena, and South Pasadena were notified by the State regarding alternatives being studied to determine the exact path of the planned freeway. Figure 1-1 is a regional location map, and Figure 1-2 provides an action location map.

In November of 1964, the California Highway Commission officially adopted the “Meridian Route” as the freeway alignment. Within a month, South Pasadena requested reconsideration of the adopted route. In February of 1965, the segment of Long Beach SR-7 between State Route 10 (SR-10; now Interstate 10 [I-10]) and Valley Boulevard was opened. Since that time, completion of the freeway segment between Valley Boulevard in Los Angeles and Del Mar Boulevard in Pasadena has been the subject of numerous administrative proceedings, court actions, and legislative initiatives. The California Department of Transportation (Caltrans) and the Los Angeles County Metropolitan Transportation Authority (Metro) are currently studying five alternatives in the SR-710 North Study Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS):

1. **No Build Alternative:** Assumes zero transportation improvements beyond those already established in the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and scheduled to be constructed by 2035. The No Build Alternative is required and serves as the baseline against which all other alternatives are compared.
2. **Transportation System Management/Transportation Demand Management (TSM/TDM) Alternative:** Includes traffic signal upgrades and synchronization, local street and intersection improvements, connections to existing bus service, and promotes rideshare.

This page intentionally left blank

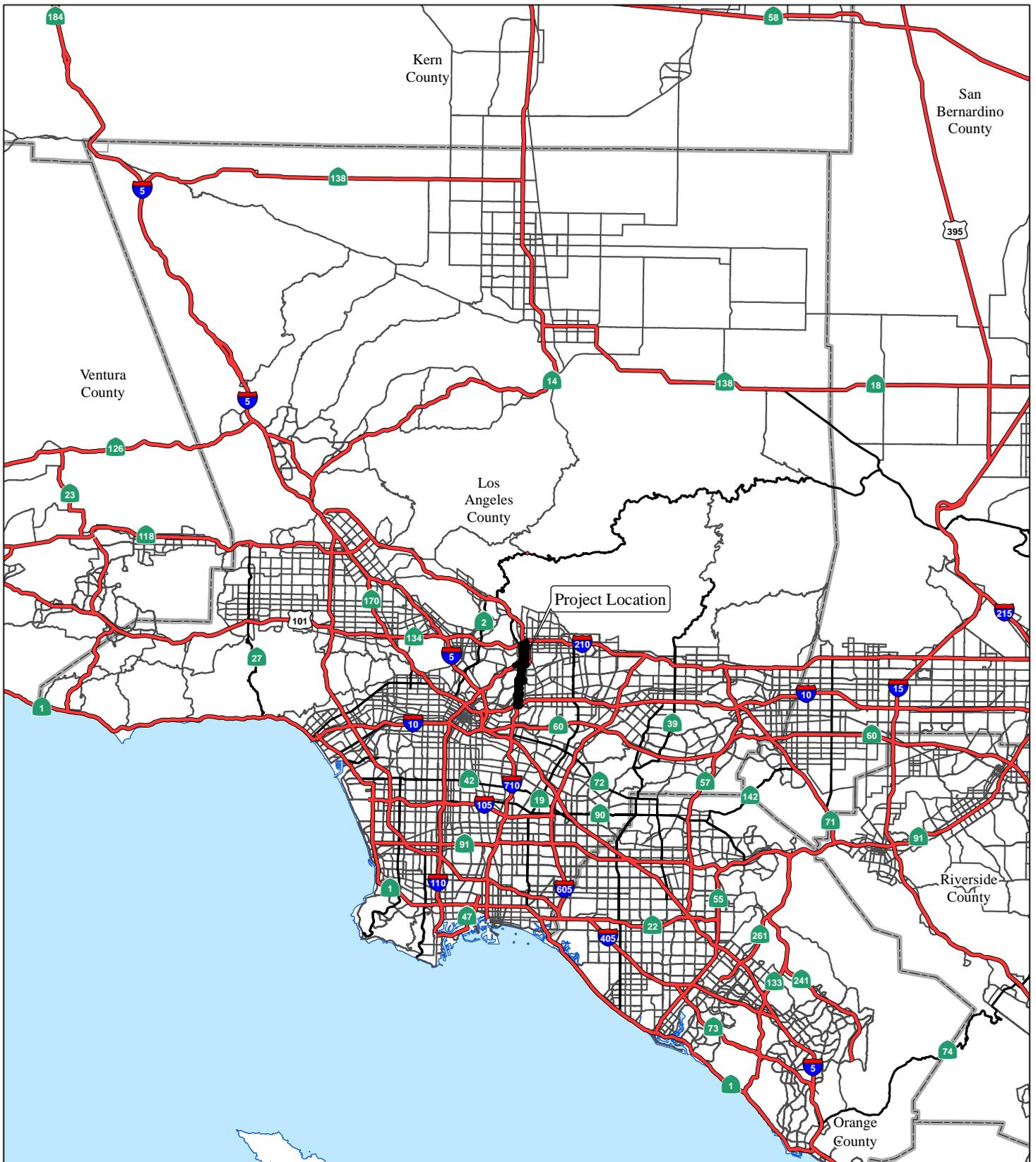
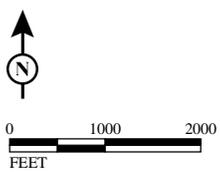
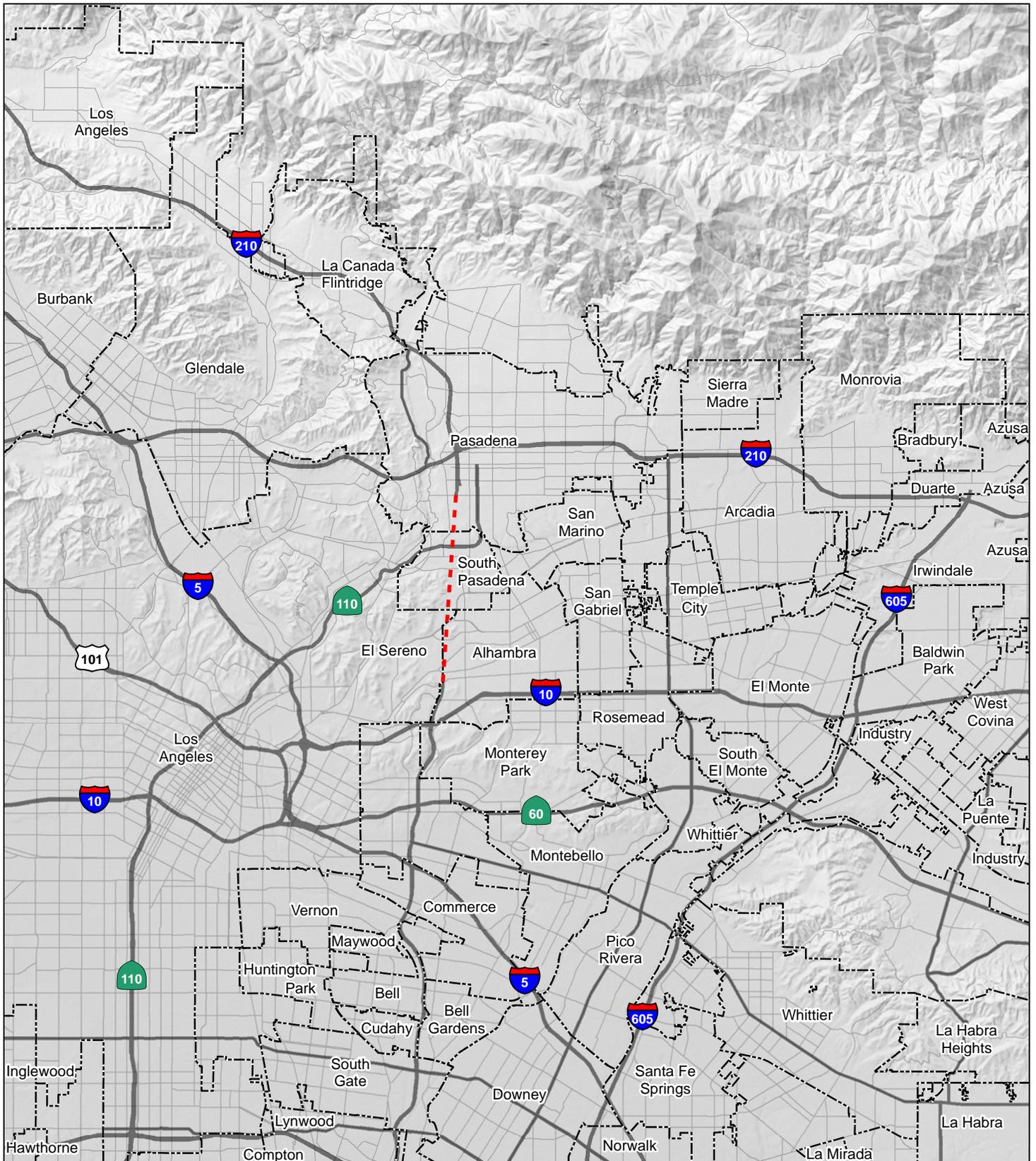


FIGURE 1-1



This page intentionally left blank



LEGEND

-  Cities and Unincorporated Communities
-  Previously Planned SR 710 Freeway Alignment (Approximate Location)*



* Note: Surface route is no longer under consideration.

FIGURE 1-2

*SR 710 Surplus Property Sale
Proposed Action Study Area Map*

SOURCE: ESRI (2008); SCAG (2010)

I:\CDT1502\GIS\PropStudyArea.mxd (5/18/2015)

This page intentionally left blank

3. **Bus Rapid Transit (BRT) Alternative:** Includes Express Buses for longer trips at high speeds that would serve the communities between East Los Angeles and Pasadena, with connecting bus service to adjacent communities, greater frequency of bus service, minimal stops, and potential dedicated bus lanes during peak hours.
4. **Light Rail Transit (LRT) Alternative:** Serves communities from East Los Angeles to Pasadena, with connecting bus service for passengers traveling to adjacent communities.
5. **Freeway Tunnel Alternative:** Extends I-710 North as an underground roadway. Design variations include single- or dual-bore tunnels, with or without tolls, with or without trucks, and possible Express Bus service.

Caltrans has identified 460 parcels, including single-family residences, multifamily residences, businesses, and vacant lots, which it began to acquire more than 50 years ago when the proposal for the “Meridian Route” was first introduced. These parcels are located in the Cities of Pasadena and South Pasadena, and in the El Sereno neighborhood of the City of Los Angeles. Once the parcels are identified as no longer necessary for the current SR-710 North Study, they may be declared excess pursuant to Streets and Highways Code Section 118 (the terms “excess” and “surplus” are used interchangeably throughout this Environmental Impact Report [EIR]):

“If the department determines that real property or an interest therein, previously or hereafter acquired by the state for highway purposes, is no longer necessary for those purposes, the department may sell, contract to sell, sell by trust deed, or exchange the real property or interest therein in the manner and upon terms, standards, and conditions established by the commission...”

In 1979, the Legislature passed Senate Bill (SB) 86, commonly referred to as the Roberti Bill, Government Code 54235 through 54238.6 (in 2001, Section 54238.7 was incorporated). The Roberti Bill establishes priorities and procedures that any State agency disposing of surplus residential property is required to follow to ensure that housing will remain available for low- or moderate-income households. The Roberti Bill also requires single-family residences to be first offered at fair market value to their former owners if they are presently occupants. The selling agency has the option of making repairs to the property acquired by lenders or government assistance programs, or providing the occupants with a replacement dwelling, pursuant to a specified provision of law.

On October 1, 2013, Governor Jerry Brown approved SB 416, authored by Senator Carol Liu (D-La Cañada Flintridge) and co-authored by Assemblymembers Mike Gatto (D-Silver Lake) and Chris Holden (D-Pasadena). SB 416 revised the government codes applicable to the sale of surplus residential properties not otherwise sold pursuant to existing procedures. SB 416 would revise the definition of “fair market value” for the purposes of the Caltrans 710 properties sale to reflect the existing “as is” condition of the properties, taking into account any required maintenance. SB 416 would also revise the procedures applicable to the sale of these surplus residential properties, which would not otherwise be sold pursuant to existing procedures, to be offered to current and former tenants in good standing. Additionally, SB 416 would authorize Caltrans to offer a residence or property in an “as is” condition at the request of a person with priority to purchase the residence or property in accordance with existing law.

For more information, see SB 416 and Government Code 54235–54238.7 (the Roberti Bill) in Appendices A and B, respectively.

1.2 Purpose and Need

1.2.1 Purpose

This action intends to offer surplus properties not impacted by the project alternatives being evaluated in the SR-710 North Study DEIR/DEIS to housing entities, previous owners, current tenants and occupants, former tenants, and new owners and persons and families of low or moderate income, pursuant to SB 416 and the Roberti Bill. The action is also intended to provide needed affordable housing in the subject area and to remove Caltrans from its property management role with these properties.

1.2.2 Need

The Caltrans need for the proposed SR-710 Surplus Property Sales include:

- Complying with SB 416, the Roberti Bill, the Affordable Sales Program (ASP), and Streets and Highways Code Section 118.

1.3 Overview of Proposed Action

This section describes the proposed action, the action location, a description of the major characteristics of the proposed SR-710 Surplus Property Sales objectives, and a list of discretionary approvals needed for action approval.

The action is located in Los Angeles County in the Cities of Pasadena, South Pasadena, and the El Sereno neighborhood in the City of Los Angeles.¹ Due to Streets and Highways Code 118, and SB 416 which provides that the preliminary project alternative referred to as Alternative F-6 in the SR-710 North Study Alternative Analysis Report² shall no longer be deemed a feasible alternative for consideration in any State environmental review process for the SR-710 North Study. Caltrans is mandated to sell approximately 460 parcels that were originally purchased for a surface freeway proposal, commonly referred to as the Route 710 Gap Closure Project. The sale of properties is planned in three phases; Phases 1A and 1B are subsets of Phase 1, and are outlined in Table 1.1.

Table 1.1 Summary of Sale Phases

Phase	Description
1	Properties not within the scope of the remaining project alternatives for the SR-710 North Study.
• 1A	Single-family residences that Caltrans has determined to be non-historic and would not result in any community impact.
• 1B	All other residential properties that are not within the scope of the remaining project alternatives.
2	Properties within the scope of the remaining project alternatives for the SR-710 North Study but that can still be sold.
3	Properties declared surplus after the completion of the approved preferred project alternative in the SR-710 North Study.

Source: http://www.dot.ca.gov/dist07/business/710sales/docs/Frequently-Asked-Questions-English_070314.pdf
 Caltrans = California Department of Transportation
 SR-710 = State Route 710

Caltrans may offer to sell vacant lots and unimproved properties pursuant to Streets and Highways Code Section 118.6, which allows properties to be offered by auction, sealed or continuous bid to the public, or by sale or exchange to public agencies. Any improved property or property with a tenant is sold by the statutes.

¹ The El Sereno neighborhood includes the area within the boundaries of the LA-32 Neighborhood Council, as approved by the City of Los Angeles Department of Neighborhood Empowerment (DONE).

² California Department of Transportation (Caltrans), District 7 and the Los Angeles County Metropolitan Transportation Authority. SR-710 North Study Alternatives Analysis Report, December 2012, http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/docs/Final_AA_report_2013-01-14_Low_Res_ES_Only.pdf, accessed July 2, 2015.

The Los Angeles Superior Court declared in *City of South Pasadena v. The California Department of Transportation* (Super. Ct. Los Angeles County, 2007, No BC331628) that legal title to all SR-710 parcels of real property shall remain vested in Caltrans until adoption of an appropriate regulation under the Administrative Procedure Act for their disposal pursuant to Government Code Sections 54235–54238.7. ASP regulations have been drafted by Caltrans Headquarters in Sacramento. Caltrans will offer the residential properties according to Government Code Sections 54235–54238.7 and the ASP regulations.

Properties offered for sale, are those that are not within the scope of the remaining project alternatives indicated in the SR-710 North Study DEIR/DEIS. The priorities in which a prospective buyer can make an offer are listed as follows:

1. All single-family residences presently occupied by their former owners who are tenants in good standing shall be offered to those former owners at the appraised fair market value.
2. All single-family residences shall be offered at an affordable price or “as is” fair market value at each buyers’ option to the present occupants who are in good standing, who have occupied the property 2 years or more, and who are persons and families of low or moderate income, and if the present occupants have not had an ownership interest in real property in the last 3 years.
3. All single-family residences shall be offered at an affordable price or “as is” fair market value at each buyers’ option to the present occupants who are in good standing, who have occupied the property 5 years or more, and whose household income does not exceed 150 percent of the area median income, and if the present occupants have not had an ownership interest in real property in the last 3 years.
4. All other surplus residential properties (including multifamily residences) and all properties described in points 1 through 3 above that are not purchased by the former owners or the present occupants shall then be offered to housing-related public and private entities at a reasonable price for affordable housing.
5. To present tenants in good standing at appraised fair market value.
6. To eligible former tenants, who were in good standing, at appraised fair market value.

The priorities in which a prospective buyer can make an offer are summarized on Figure 1-3.



Properties offered for sale, upon approval of regulations (2015), are those that are not within the scope of the remaining project alternatives indicated in the draft environmental report. Purchase of state designated historic properties in locally designated historic districts may have to meet additional requirements.

Priority (A)	Priority of Potential Buyers (A)	Offer Price ^(A)	Conditions for Sale	Restrictions on Resale at Fair Market Value
1	Current Tenant: ➤ Who is the Former Owner	Appraised Fair Market Value	Tenant is in good standing.	None.
2	Current Occupants: ➤ In residence for 2 or more years ➤ Of low or moderate income ^(B)	Affordable Price OR Appraised Fair Market Value (at tenant's request)	For property sold at an Affordable Price: ➤ Tenant is in good standing ➤ Caltrans will provide limited repairs	For property sold at an Affordable Price, restrictions apply. ^(C)
3	Current Occupants: ➤ In residence for 5 or more years ➤ At not more than 150% of area median income ^(B)	Affordable Price OR Appraised Fair Market Value (at tenant's request)	For property sold at an Affordable Price: ➤ Tenant is in good standing ➤ Caltrans will provide limited repairs	For property sold at an Affordable Price, restrictions apply. ^(C)
4	Public or private affordable housing-related entity	Reasonable Price	Purchaser must: 4a) First offer to sell concurrently to current tenant, 4b) If refused, second, offer to rent to current tenant, 4c) If refused, third, rent as housing for households with lower income, moderate income or gross income not exceeding 150% of area median income. OR Purchaser shall rehabilitate and develop property as limited equity cooperative housing, if feasible.	Restrictions apply. ^(D)
5	Current tenant	Appraised Fair Market Value	Tenant is in good standing.	None.
6	Former tenants in reverse order of tenancy	Appraised Fair Market Value	Tenant was in good standing.	None.
7	Potential Owner Occupant or purchaser who will develop property.	Auction	Property sold at a resulting auction price.	None.

- A) As provided in the Roberti Bill and amended by Senate Bill 416. Priorities 1 through 3 apply to single-family residences. Priorities 4 through 7 apply to all other surplus residential properties (including multi-family residences) and all properties in priorities 1, 2, or 3 that are not purchased by the former owners or the present occupants
- B) Present occupants must not have had an ownership interest in real property in the last three years.
- C) If the property is purchased at an affordable price, the buyer can resell the property but will not retain all the proceeds of sale. CalHFA will be entitled to the net equity and a portion of the net appreciation. After the first year, the buyer will be entitled to an increasing share of the net appreciation. After five years, the buyer will be entitled to all of the net appreciation.
- D) If the property is purchased at a reasonable price, the buyer can resell the property but will not retain all the proceeds of sale. CalHFA will be entitled to 50 percent of the net equity and a portion of the net appreciation. After the first year, the buyer will be entitled to an increasing share of the net appreciation. After five years, the buyer will be entitled to all of the net appreciation. All net proceeds shall be used to preserve, upgrade and expand the supply of affordable housing exclusively in the Pasadena, South Pasadena, Alhambra, La Canada Flintridge and the 90032 zip code.
- Net Equity** is the approved fair market value at the time of initial sale minus the initial sale price.
- Net Appreciation** is the fair market value resale price minus the net equity, remaining principal loan balances, closing costs paid by the seller at resale, owner's down payment, cost of improvements (subject to state determination).

FIGURE 1-3

This page intentionally left blank

SB 416 requires proceeds from the sale of surplus properties to be allocated to the SR-710 Rehabilitation Account for the rehabilitation of surplus single-family homes being sold to low- and moderate-income occupants for which lenders or government housing assistance programs require repairs. The SR-710 Rehabilitation Account is continuously refilled with each sale. Per SB 416, when the balance of this account reaches \$500,000, additional proceeds go to the State Highway Account for allocation by the California Transportation Commission (CTC) to be used exclusively for projects located in Pasadena, South Pasadena, Alhambra, La Cañada Flintridge, and the 90032 Zip Code area of Los Angeles (El Sereno). The properties analyzed in this document are listed in Table 1.2 and shown on Figure 1-4. Although the proposed action contemplates the sale of 460 properties, as shown in Table 1.2, many of the properties contain multiple residential or commercial units.

1.4 Permits and Approvals Needed

The following permits, reviews, and approvals would be required for action implementation:

Agency	Permit/Approval	Status
SHPO	Concurrence with the determinations of eligibility	Received May 2015
SHPO	Concurrence with the finding of effect	Received July 2016
Caltrans	Certification of Final EIR	Received July 2016
	Finalize regulations to sell surplus properties	Received July 2016
CTC	Approval of conveyance of highway property	Expected prior to sale

Source: Caltrans (July 2016).

Caltrans = California Department of Transportation

CTC = California Transportation Commission

EIR = Environmental Impact Report

SHPO = State Historic Preservation Officer

Table 1.2 List of Potential Surplus Properties

No.	Street Address	City	Caltrans Parcel No.
1	North of 5575 Valley Boulevard	Los Angeles	3001
2	West of 5649 Alhambra Avenue	Los Angeles	003003
3	3220 Front Street	Los Angeles	03006
4	5649-A Alhambra Avenue	Los Angeles	003008
5	5519 Templeton Street	Los Angeles	3542
6	3826 Sheffield Avenue	Los Angeles	3610
7	3911 Stockbridge Avenue	Los Angeles	3623
8	5440 Huntington Drive	Los Angeles	3650
9	5440 1/2 Huntington Drive	Los Angeles	3650
10	5442 A Huntington Drive	Los Angeles	3650
11	5442 B Huntington Drive	Los Angeles	3650
12	5442 1/2 Huntington Drive	Los Angeles	3650
13	5444 Huntington Drive	Los Angeles	3650
14	544 1/2 Huntington Drive	Los Angeles	3650
15	5451 Shelley Street	Los Angeles	3653
16	5453 Shelley Street	Los Angeles	3654
17	4010 Lowell Avenue	Los Angeles	3659
18	5486 Huntington Drive	Los Angeles	003661
19	5565 Valley Boulevard	Los Angeles	014135
20	5575 Valley Boulevard	Los Angeles	014136
21	5529 Concord Avenue	Los Angeles	014891
22	3125 Winchester	Los Angeles	018266
23	5600 Alhambra Avenue	Los Angeles	018497
24	2958 Lowell Avenue	Los Angeles	018500
25	5520 Concord Avenue	Los Angeles	018501
26	5548 Concord Avenue	Los Angeles	018503
27	5550 Concord Avenue	Los Angeles	018503
28	5556 Concord Avenue	Los Angeles	18504
29	5562 Concord Avenue	Los Angeles	018505
30	5564 Concord Avenue	Los Angeles	018505
31	2962 Lowell Avenue	Los Angeles	018506
32	2968 Lowell Avenue	Los Angeles	018507
33	2970 Lowell Avenue	Los Angeles	018508
34	2974 Lowell Avenue	Los Angeles	18509
35	2978 Lowell Avenue	Los Angeles	018510
36	5523 Concord Avenue	Los Angeles	18511
37	5537 Concord Avenue	Los Angeles	18512
38	5541 Concord Avenue	Los Angeles	18513
39	2990 Lowell Avenue	Los Angeles	18514
40	5506 Allan Street	Los Angeles	018515
41	5510 Allan Street	Los Angeles	018516
42	5514 Allan Street	Los Angeles	018517
43	5518 Allan Street	Los Angeles	018518
44	5524 Allan Street	Los Angeles	018519
45	5528 Allan Street	Los Angeles	018520
46	5532 Allan Street	Los Angeles	018521
47	5538 Allan Street	Los Angeles	018522
48	5536 Allan Street	Los Angeles	018522
49	5544 Allan Street	Los Angeles	018523
50	5501 Allan Street	Los Angeles	18524
51	5507 Allan Street	Los Angeles	018525
52	5511 Allan Street	Los Angeles	018526
53	5515 Allan Street	Los Angeles	018527
54	5519 Allan Street	Los Angeles	018528
55	5523 Allan Street	Los Angeles	018529

Table 1.2 List of Potential Surplus Properties

No.	Street Address	City	Caltrans Parcel No.
56	3115 Sheffield Avenue	Los Angeles	18530
57	3119 Sheffield Avenue	Los Angeles	018531
58	3123 Sheffield Avenue	Los Angeles	018532
59	3127 Sheffield Avenue	Los Angeles	018533
60	3131 Sheffield Avenue	Los Angeles	018534
61	3135 Sheffield Avenue	Los Angeles	018535
62	3137 Sheffield Avenue	Los Angeles	018536
63	3145 Sheffield Avenue	Los Angeles	018537
64	3201 Sheffield Avenue	Los Angeles	018538
65	3205 Sheffield Avenue	Los Angeles	018539
66	3209 Sheffield Avenue	Los Angeles	018540
67	3215 Sheffield Avenue	Los Angeles	018541
68	3219 Sheffield Avenue	Los Angeles	018542
69	3223 Sheffield Avenue	Los Angeles	018543
70	3227 Sheffield Avenue	Los Angeles	018544
71	5518 Norwich Avenue	Los Angeles	018546
72	5522 Norwich Avenue	Los Angeles	018547
73	5531 Allan Street	Los Angeles	018548
74	5537 Allan Street	Los Angeles	018549
75	5541 Allan Street	Los Angeles	018550
76	3114 Sheffield Avenue	Los Angeles	018554
77	3118 Sheffield Avenue	Los Angeles	018555
78	3122 Sheffield Avenue	Los Angeles	018556
79	3126 Sheffield Avenue	Los Angeles	018557
80	3130 Sheffield Avenue	Los Angeles	018558
81	3134 Sheffield Avenue	Los Angeles	018559
82	3138 Sheffield Avenue	Los Angeles	018560
83	3144 Sheffield Avenue	Los Angeles	018561
84	3200 Sheffield Avenue	Los Angeles	018562
85	3206 Sheffield Avenue	Los Angeles	018563
86	3210 Sheffield Avenue	Los Angeles	018564
87	3216 Sheffield Avenue	Los Angeles	018565
88	3218 Sheffield Avenue	Los Angeles	018566
89	3222 Sheffield Avenue	Los Angeles	018567
90	3226 Sheffield Avenue	Los Angeles	018568
91	5532 Norwich Avenue	Los Angeles	018583
92	5536 Norwich Avenue	Los Angeles	018584
93	5540 Norwich Avenue	Los Angeles	018585
94	5519 Norwich Avenue	Los Angeles	018590
95	5523 Norwich Avenue	Los Angeles	018591
96	3315 Sheffield Avenue	Los Angeles	018592
97	3319 Sheffield Avenue	Los Angeles	018593
98	3323 Sheffield Avenue	Los Angeles	018594
99	3327 Sheffield Avenue	Los Angeles	018595
100	3331 Sheffield Avenue	Los Angeles	018596
101	3335 Sheffield Avenue	Los Angeles	018597
102	3339 Sheffield Avenue	Los Angeles	018598
103	3343 Sheffield Avenue	Los Angeles	018599
104	3401 Sheffield Avenue	Los Angeles	018600
105	3405 Sheffield Avenue	Los Angeles	018601
106	3409 Sheffield Avenue	Los Angeles	018602
107	3415 Sheffield Avenue	Los Angeles	018603
108	3419 Sheffield Avenue	Los Angeles	018604
109	3423 Sheffield Avenue	Los Angeles	018605
110	3427 Sheffield Avenue	Los Angeles	018606

Table 1.2 List of Potential Surplus Properties

No.	Street Address	City	Caltrans Parcel No.
111	3431 Sheffield Avenue	Los Angeles	018607
112	5520 Templeton Street	Los Angeles	018609
113	5522 Templeton Street	Los Angeles	018610
114	5533 Norwich Avenue	Los Angeles	018611
115	5537 Norwich Avenue	Los Angeles	018612
116	5541 Norwich Avenue	Los Angeles	018613
117	3314 Sheffield Avenue	Los Angeles	018614
118	3318 Sheffield Avenue	Los Angeles	018615
119	3322 Sheffield Avenue	Los Angeles	018616
120	3326 Sheffield Avenue	Los Angeles	018617
121	3330 Sheffield Avenue	Los Angeles	018618
122	3334 Sheffield Avenue	Los Angeles	018619
123	3338 Sheffield Avenue	Los Angeles	018620
124	3342 Sheffield Avenue	Los Angeles	018621
125	3400 Sheffield Avenue	Los Angeles	018622
126	3404 Sheffield Avenue	Los Angeles	018623
127	3408 Sheffield Avenue	Los Angeles	018624
128	3412 Sheffield Avenue	Los Angeles	018625
129	3418 Sheffield Avenue	Los Angeles	018626
130	3422 Sheffield Avenue	Los Angeles	018627
131	3426 Sheffield Avenue	Los Angeles	018628
132	3430 Sheffield Avenue	Los Angeles	018629
133	5532 Templeton Street	Los Angeles	018630
134	5536 Templeton Street	Los Angeles	018631
135	5466-68 Huntington Drive	Los Angeles	030505
136	5523 Templeton Street	Los Angeles	030543
137	3515 Sheffield Avenue	Los Angeles	030544
138	3519 Sheffield Avenue	Los Angeles	030545
139	3523 Sheffield Avenue	Los Angeles	030546
140	3529 Sheffield Avenue	Los Angeles	030547
141	3533 Sheffield Avenue	Los Angeles	030548
142	3537 Sheffield Avenue	Los Angeles	030549
143	3541 Sheffield Avenue	Los Angeles	030550
144	3701 Sheffield Avenue	Los Angeles	030551
145	3705 Sheffield Avenue	Los Angeles	030552
146	3711 Sheffield Avenue	Los Angeles	030553
147	3715 Sheffield Avenue	Los Angeles	030554
148	3719 Sheffield Avenue	Los Angeles	030555
149	3723 Sheffield Avenue	Los Angeles	030556
150	5514 Poplar Boulevard	Los Angeles	030559
151	5518 Poplar Boulevard	Los Angeles	030560
152	5531 Templeton Street	Los Angeles	030561
153	5537 Templeton Street	Los Angeles	030562
154	3514 Sheffield Avenue	Los Angeles	030565
155	3518 Sheffield Avenue	Los Angeles	030566
156	3522 Sheffield Avenue	Los Angeles	030567
157	3526 Sheffield Avenue	Los Angeles	030568
158	3530 Sheffield Avenue	Los Angeles	030569
159	3534 Sheffield Avenue	Los Angeles	030570
160	3540 Sheffield Avenue	Los Angeles	030571
161	3700 Sheffield Avenue	Los Angeles	030572
162	3706 Sheffield Avenue	Los Angeles	030573
163	3710 Sheffield Avenue	Los Angeles	030574
164	3716 Sheffield Avenue	Los Angeles	030575
165	3720 Sheffield Avenue	Los Angeles	030576

Table 1.2 List of Potential Surplus Properties

No.	Street Address	City	Caltrans Parcel No.
166	3724 Sheffield Avenue	Los Angeles	030577
167	5532 Poplar Boulevard	Los Angeles	030578
168	5536 Poplar Boulevard	Los Angeles	030579
169	5540 Poplar Boulevard	Los Angeles	030580
170	5515 Poplar Boulevard	Los Angeles	030593
171	5519 Poplar Boulevard	Los Angeles	030594
172	3815 Sheffield Avenue	Los Angeles	030595
173	3817 Sheffield Avenue	Los Angeles	030596
174	3823 Sheffield Avenue	Los Angeles	030597
175	3827 Sheffield Avenue	Los Angeles	030598
176	3837 Sheffield Avenue	Los Angeles	030600
177	3841 Sheffield Avenue	Los Angeles	030601
178	5533 Poplar Boulevard	Los Angeles	030602
179	5537 Poplar Boulevard	Los Angeles	030603
180	5539 Poplar Boulevard	Los Angeles	030603
181	5541 Poplar Boulevard	Los Angeles	030604
182	3818 Sheffield Avenue	Los Angeles	030608
183	3822 Sheffield Avenue	Los Angeles	030609
184	3832 Sheffield Avenue	Los Angeles	030611
185	3836 Sheffield Avenue	Los Angeles	030612
186	3928 Stockbridge Avenue	Los Angeles	030613
187	3913 Stockbridge Avenue	Los Angeles	030617
188	3911 Stockbridge Avenue	Los Angeles	030617
189	3917 Stockbridge Avenue	Los Angeles	030618
190	3923 Stockbridge Avenue	Los Angeles	030619
191	3927-29 Stockbridge Avenue	Los Angeles	030620
192	3933 Stockbridge Avenue	Los Angeles	030621
193	3935 Stockbridge Avenue	Los Angeles	030621
194	3931 Stockbridge Avenue	Los Angeles	030621
195	3931-Ldy Stockbridge Avenue	Los Angeles	030621
196	3939 Stockbridge Avenue	Los Angeles	030622
197	5454 Keats Street	Los Angeles	030624
198	5460 Keats Street	Los Angeles	030625
199	5464 Keats Street	Los Angeles	030626
200	5470 Keats Street	Los Angeles	030627
201	5476 Keats Street	Los Angeles	030628
202	3955 Lowell Avenue	Los Angeles	030633
203	3953 Lowell Avenue	Los Angeles	030633
204	3951 Lowell Avenue	Los Angeles	030633
205	3949 Lowell Avenue	Los Angeles	030633
206	5465 Keats Street	Los Angeles	030634
207	5471 Keats Street	Los Angeles	30635
208	5477 Keats Street	Los Angeles	030636
209	5450 Shelley Street	Los Angeles	030638
210	5460 Shelley Street	Los Angeles	030639
211	5458 Shelley Street	Los Angeles	030639
212	5443 Shelley Street	Los Angeles	030650
213	4007-D Lowell Avenue	Los Angeles	030651
214	4007-A Lowell Avenue	Los Angeles	030651
215	4005 Lowell Avenue	Los Angeles	030651
216	4007-B Lowell Avenue	Los Angeles	030651
217	4007-C Lowell Avenue	Los Angeles	030651
218	4007-Ldy Lowell Avenue	Los Angeles	030651
219	5461 Shelley Street	Los Angeles	030655
220	5459 Shelley Street	Los Angeles	030655

Table 1.2 List of Potential Surplus Properties

No.	Street Address	City	Caltrans Parcel No.
221	5465 Shelley Street	Los Angeles	030656
222	5467 Shelley Street	Los Angeles	030656
223	5460 Huntington Drive	Los Angeles	030660
224	5460 Huntington Drive	Los Angeles	30660
225	5480 Huntington Drive	Los Angeles	30661
226	5450 Huntington Drive	Los Angeles	30662
227	215 Fairview	South Pasadena	41452
228	762 St. John Avenue	Pasadena	041595
229	234 Bellefontaine Street	Pasadena	041596
230	821 Bonita	South Pasadena	41597
231	224 State Street	Pasadena	041598
232	232 State Street	Pasadena	041598
233	1028 Magnolia Street	South Pasadena	41787
234	1011 Foothill Street	South Pasadena	043578
235	275 Arlington Drive	Pasadena	043671
236	5524 Kendall Avenue	Los Angeles	043710
237	4363 Maycrest Avenue	Los Angeles	043711
238	540 Prospect Avenue	South Pasadena	044428
239	885 Oneonta Drive	South Pasadena	044538
240	242 Bellefontaine Street	Pasadena	044879
241	4326 Lowell Avenue	Los Angeles	045340
242	705 Bonita Drive	South Pasadena	045423
243	1832 Gillette Crescent	South Pasadena	45423
244	2011 Cambridge Place	South Pasadena	045699
245	1041 Foothill Street	South Pasadena	045724
246	218 Madeline Drive	Pasadena	045739
247	302 Fairview Avenue	South Pasadena	45857
248	5462 Almont Street	Los Angeles	046781
249	245 Waverly Drive	Pasadena	46819
250	255 Waverly Drive	Pasadena	46820
251	268 Waverly Drive	Pasadena	046831
252	375 Havendale Drive	Pasadena	46832
253	385 Havendale Drive	Pasadena	046833
254	405 Havendale Drive	Pasadena	46834
255	Northwest of Corn Havendale / Bellevue	Pasadena	046835
256	220 Bellevue Drive	Pasadena	46836
257	??? Palmetto Drive	Pasadena	46837
258	250 Bellevue Drive	Pasadena	46838
259	253 Palmetto Drive	Pasadena	46839
260	535 Pasadena Avenue	Pasadena	046843
261	227A California Boulevard West	Pasadena	046844
262	227B California Boulevard West	Pasadena	046844
263	225B California Boulevard West	Pasadena	046844
264	229A California Boulevard West	Pasadena	046844
265	229B California Boulevard West	Pasadena	046844
266	225D California Boulevard West	Pasadena	046844
267	233 California Boulevard West	Pasadena	046844
268	229D California Boulevard West	Pasadena	046844
269	231 California Boulevard West	Pasadena	046844
270	229C California Boulevard West	Pasadena	046844
271	225A California Boulevard West	Pasadena	046844
272	225-Ldy California Boulevard	Pasadena	46844
273	225C California Boulevard West	Pasadena	046844
274	244 Palmetto Drive	Pasadena	46847
275	West of 244 Palmetto Drive	Pasadena	46848

Table 1.2 List of Potential Surplus Properties

No.	Street Address	City	Caltrans Parcel No.
276	2035 Berkshire Avenue	South Pasadena	047407
277	316 Fairview Avenue	South Pasadena	047409
278	508 Meridian Avenue	South Pasadena	47416
279	4411 Alpha Street	Los Angeles	47417
280	4411 1/2 Alpha Street	Los Angeles	47417
281	1019 Foothill Street	South Pasadena	047425
282	1151 Pasadena Avenue	Pasadena	047443
283	4339 Maycrest Avenue	Los Angeles	047444
284	205 Madeline Drive	Pasadena	047445
285	721 Pasadena Avenue	Pasadena	47616
286	1190 Pasadena Avenue	Pasadena	047776
287	2028 Berkshire Avenue	South Pasadena	047924
288	169 Arlington W. Drive	Pasadena	047977
289	5433 Huntington Drive	Los Angeles	48087
290	4215 Maycrest Avenue	Los Angeles	48097
291	4215 1/2 Maycrest Avenue	Los Angeles	48097
292	4217 Maycrest Avenue	Los Angeles	48097
293	4217 1/2 Maycrest Avenue	Los Angeles	48097
294	4219 Maycrest Avenue	Los Angeles	48097
295	4219 1/2 Maycrest Avenue	Los Angeles	48097
296	4221 Maycrest Avenue	Los Angeles	48097
297	4221 1/2 Maycrest Avenue	Los Angeles	48097
298	5468 Almont Street	Los Angeles	048098
299	5466 Almont Street	Los Angeles	048098
300	4228 Maycrest Avenue	Los Angeles	048102
301	4226 Maycrest Avenue	Los Angeles	048102
302	4302 Maycrest Avenue	Los Angeles	048102
303	4312 Maycrest Avenue	Los Angeles	048104
304	4316 Maycrest Avenue	Los Angeles	048105
305	4320 Maycrest Avenue	Los Angeles	048106
306	4326 Maycrest Avenue	Los Angeles	048107
307	4332 Maycrest Avenue	Los Angeles	048108
308	4364 Maycrest Avenue	Los Angeles	048112
309	4362 Maycrest Avenue	Los Angeles	048112
310	4358 Maycrest Avenue	Los Angeles	048112
311	4360 Maycrest Avenue	Los Angeles	048112
312	5460 Newtonia Avenue	Los Angeles	048112
313	4303 Maycrest Avenue	Los Angeles	048116
314	4317 Maycrest Avenue	Los Angeles	048119
315	4329 Maycrest Avenue	Los Angeles	048121
316	4359 Maycrest Avenue	Los Angeles	048126
317	4422 Maycrest Avenue	Los Angeles	048130
318	4432 Maycrest Avenue	Los Angeles	048132
319	4417 Alpha Street	Los Angeles	048134
320	4451 Alpha Street	Los Angeles	048141
321	4507 Alpha Street	Los Angeles	048143
322	5501 Berkshire Drive	Los Angeles	048144
323	5500 Atlas Street	Los Angeles	048145
324	5506 Atlas Street	Los Angeles	048146
325	5512 Atlas Street	Los Angeles	048147
326	5513 Atlas Street	Los Angeles	048150
327	4524 Alpha Street	Los Angeles	48151
328	231 Columbia Street	Pasadena	048156
329	1207 Pasadena Avenue	Pasadena	048158
330	1199 Pasadena Avenue	Pasadena	048159

Table 1.2 List of Potential Surplus Properties

No.	Street Address	City	Caltrans Parcel No.
331	1191 Pasadena Avenue	Pasadena	048160
332	214 State Street	Pasadena	048161
333	1175 Pasadena Avenue	Pasadena	048162
334	181 Columbia Street	Pasadena	048163
335	1200 Pasadena Avenue	Pasadena	048168
336	180 State Street	Pasadena	048170
337	1150 Pasadena Avenue	Pasadena	048171
338	1142 Pasadena Avenue	Pasadena	048172
339	1140 Pasadena Avenue	Pasadena	048172
340	1128 Pasadena Avenue	Pasadena	048173
341	1120 Pasadena Avenue	Pasadena	048174
342	1112 Pasadena Avenue	Pasadena	048175
343	1100 Pasadena Avenue	Pasadena	048176
344	1090 Pasadena Avenue	Pasadena	048177
345	1080 Pasadena Avenue	Pasadena	048178
346	1062 Pasadena Avenue	Pasadena	048179
347	180 Glenarm Street	Pasadena	048180
348	225 State Street	Pasadena	048181
349	1141 Pasadena Avenue	Pasadena	048182
350	1131 Pasadena Avenue	Pasadena	048183
351	230 Madeline Drive	Pasadena	048184
352	202 Madeline Drive	Pasadena	048185
353	215 Madeline Drive	Pasadena	048187
354	225 Madeline Drive	Pasadena	048188
355	1059 Pasadena Avenue	Pasadena	048189
356	1051 Pasadena Avenue	Pasadena	048190
357	1041 Pasadena Avenue	Pasadena	048191
358	1031 Pasadena Avenue	Pasadena	048192
359	216 Arlington Drive	Pasadena	048193
360	1030 Pasadena Avenue	Pasadena	048194
361	185 Glenarm Street	Pasadena	048195
362	180 Arlington Drive	Pasadena	048196
363	177 Glenarm Street	Pasadena	048197
364	1000 Pasadena Avenue	Pasadena	048198
365	181 Arlington Drive	Pasadena	048199
366	966 Pasadena Avenue	Pasadena	048200
367	956 Pasadena Avenue	Pasadena	048201
368	946 Pasadena Avenue	Pasadena	048202
369	936 Pasadena Avenue	Pasadena	048203
370	926 Pasadena Avenue	Pasadena	048204
371	953 Pasadena Avenue	Pasadena	048206
372	955 Pasadena Avenue	Pasadena	048207
373	949 Pasadena Avenue	Pasadena	048207
374	929 Pasadena Avenue	Pasadena	048208
375	250 Wigmore Drive	Pasadena	048209
376	230 Wigmore Drive	Pasadena	48210
377	212 Wigmore Drive	Pasadena	048211
378	231 Wigmore Drive	Pasadena	048212
379	215 Wigmore Drive	Pasadena	048213
380	900 Pasadena Avenue	Pasadena	048214
381	177 Hurlbut Street	Pasadena	048215
382	894/894B Pasadena Avenue	Pasadena	48216
383	888 Pasadena Avenue	Pasadena	048217
384	876 Pasadena Avenue	Pasadena	048218
385	866 Pasadena Avenue	Pasadena	048219

Table 1.2 List of Potential Surplus Properties

No.	Street Address	City	Caltrans Parcel No.
386	182 Bellefontaine Street	Pasadena	048220
387	172 Bellefontaine Street	Pasadena	48222
388	235 Bellefontaine Street	Pasadena	048223
389	203 Bellefontaine Street	Pasadena	048224
390	801 Pasadena Avenue	Pasadena	048225
391	779 Pasadena Avenue	Pasadena	048225
392	765 Pasadena Avenue	Pasadena	048226
393	763 Pasadena Avenue	Pasadena	048227
394	737 Pasadena Avenue	Pasadena	048228
395	734 St. John Avenue	Pasadena	048229
396	726 St. John Avenue	Pasadena	048230
397	714 St. John Avenue	Pasadena	048231
398	696 St. John Avenue	Pasadena	048232
399	678B St. John Avenue	Pasadena	048233
400	678 St. John Avenue	Pasadena	048233
401	650 St. John Avenue	Pasadena	048234
402	646 St. John Avenue	Pasadena	048235
403	640 St. John Avenue	Pasadena	048236
404	628 St. John Avenue	Pasadena	048237
405	620 St. John Avenue	Pasadena	048238
406	602 St. John Avenue	Pasadena	048239
407	600 St. John Avenue	Pasadena	048240
408	584 St. John Avenue	Pasadena	048241
409	711 Pasadena Avenue	Pasadena	048243
410	679 Pasadena Avenue	Pasadena	048243
411	703 Pasadena Avenue	Pasadena	48243
412	North of 679 Pasadena Avenue	Pasadena	048244
413	South of 615 Pasadena Avenue	Pasadena	048244
414	673 Pasadena Avenue	Pasadena	48244
415	210 California Boulevard West	Pasadena	048246
416	206 California Boulevard West	Pasadena	048246
417	214 California Boulevard West	Pasadena	048246
418	216 California Boulevard West	Pasadena	048246
419	208 California Boulevard West	Pasadena	048246
420	212 California Boulevard West	Pasadena	048246
421	202 California Boulevard West	Pasadena	048247
422	204 California Boulevard West	Pasadena	048247
423	595 Pasadena Avenue	Pasadena	048248
424	190 California Boulevard West	Pasadena	048248
425	240 State Street	Pasadena	048341
426	265 Waverly Drive	Pasadena	049322
427	R/385 Havendale Drive	Pasadena	49325
428	275 Bellevue Drive	Pasadena	49327
429	272 Bellevue Drive	Pasadena	49328
430	269 Palmetto Drive	Pasadena	049329
431	670 St. John Avenue	Pasadena	049399
432	245 Wigmore Drive	Pasadena	049584
433	1101 Columbia Street	South Pasadena	049685
434	1035 Foothill Street	South Pasadena	049741
435	2007 Cambridge Place	South Pasadena	060763
436	1021 Foothill Street	South Pasadena	061157
437	910 Bonita Drive	South Pasadena	061158
438	533 Prospect Avenue	South Pasadena	061159
439	1134 Glendon Way	South Pasadena	061161
440	1136 Glendon Way	South Pasadena	061161

Table 1.2 List of Potential Surplus Properties

No.	Street Address	City	Caltrans Parcel No.
441	1110 Glendon Way	South Pasadena	061162
442	1321 Meridian Avenue	South Pasadena	061163
443	237 State Street	Pasadena	061218
444	532 Meridian Avenue	South Pasadena	061294
445	5601 Valley Boulevard	Los Angeles	061314
446	5601 Valley Boulevard	Los Angeles	061314
447	216 Fairview Avenue	South Pasadena	061337
448	1109 Columbia Street	South Pasadena	061338
449	1821 Meridian Avenue	South Pasadena	061345
450	804 Valley View	South Pasadena	62582
451	925 Jane Place	Pasadena	062588
452	905 Summit Drive	South Pasadena	062882
453	907 Summit Drive	South Pasadena	062882
454	West of 165 Hurlbut Street	Pasadena	62915
455	2006 Berkshire Avenue	South Pasadena	64544
456	5469 Shelley Street	Los Angeles	064556
457	5474 Newtonia Drive	Los Angeles	064557
458	4401 Maycrest Avenue	Los Angeles	064558
459	1722 Gillette Crescent	South Pasadena	067022
460	5506 Norwich Avenue	Los Angeles	067029
461	903 Monterey Road	South Pasadena	067102
462	911 Monterey Road	South Pasadena	067109
463	3138 Lowell Avenue	Los Angeles	067151
464	4334 1/2 Lowell Avenue	Los Angeles	067174
465	4332 Lowell Avenue	Los Angeles	067174
466	4334 Lowell Avenue	Los Angeles	67174
467	5501 Templeton Street	Los Angeles	067178
468	5541 Templeton Street	Los Angeles	067204
469	495 Prospect Circle	South Pasadena	067320
470	801 Bonita Drive	South Pasadena	067332
471	4336 Lowell Avenue	Los Angeles	67555
472	901 Bonita Drive	South Pasadena	067556
473	534 Orange Grove Avenue	South Pasadena	067558
474	1707 Meridian Avenue	South Pasadena	067567
475	5464 Shelley Street	Los Angeles	067879
476	1325 Meridian Avenue	South Pasadena	067897
477	808 Valley View	South Pasadena	068109
478	4442 Maycrest Avenue	Los Angeles	068147
479	2042 Alpha Avenue	South Pasadena	068168
480	816 Bonita Drive	South Pasadena	068213
481	728 Bonita Drive	South Pasadena	68222
482	1101 Pine Street	South Pasadena	068232
483	1724 Gillette Crescent	South Pasadena	068262
484	807 Rollin Street	South Pasadena	68310
485	845 Bank Street	South Pasadena	068327
486	854 Bank Street	South Pasadena	068328
487	916 Lyndon Street	South Pasadena	068347
488	863 Monterey Road	South Pasadena	068353
489	1131 Glendon Way	South Pasadena	068355
490	908 Monterey Road	South Pasadena	068358
491	910 Monterey Road	South Pasadena	068358
492	1008 Hope Street	South Pasadena	068439
493	1002 Hope Street	South Pasadena	068439
494	726 Meridian Avenue	South Pasadena	068439
495	709 Fairview Avenue	South Pasadena	068453

Table 1.2 List of Potential Surplus Properties

No.	Street Address	City	Caltrans Parcel No.
496	705 Fairview Avenue	South Pasadena	068453
497	1041 Magnolia Street	South Pasadena	068453
498	711 Fairview Avenue	South Pasadena	068453
499	707 Fairview Avenue	South Pasadena	068453
500	1043 Magnolia Street	South Pasadena	068453
501	705-Ldy Fairview Avenue	South Pasadena	068453
502	626 Prospect Avenue F	South Pasadena	068463
503	626 Prospect Avenue G	South Pasadena	068463
504	626 Prospect Avenue H	South Pasadena	068463
505	626 Prospect Avenue C	South Pasadena	068463
506	626 Prospect Avenue B	South Pasadena	068463
507	626 Prospect Avenue D	South Pasadena	068463
508	626 Prospect Avenue A	South Pasadena	068463
509	626 Prospect Avenue M	South Pasadena	068463
510	626 Prospect Avenue J	South Pasadena	068463
511	626 Prospect Avenue E	South Pasadena	068463
512	626 Prospect Avenue L	South Pasadena	068463
513	626 Prospect Avenue K	South Pasadena	068463
514	626-Ldy Prospect Avenue (Ldy)	South Pasadena	068463
515	1037 Grevelia Street	South Pasadena	68494
516	1039 Grevelia Street	South Pasadena	68494
517	1107 Grevelia Street	South Pasadena	68499
518	1109 Grevelia Street	South Pasadena	068500
519	535 Meridian Avenue	South Pasadena	068509
520	1107 Foothill Street	South Pasadena	068517
521	1005 Buena Vista	South Pasadena	068528
522	1030 Foothill Street	South Pasadena	068530
523	400 Prospect Circle	South Pasadena	068553
524	226 Beacon Avenue	South Pasadena	068575
525	226 1/2 Beacon Avenue	South Pasadena	068575
526	311 Fairview Avenue	South Pasadena	068576
527	1015 Columbia Street	South Pasadena	068584
528	1131 Columbia Street	South Pasadena	068598
529	217 Fremont Avenue	South Pasadena	68599
530	225 Fremont Avenue	South Pasadena	68600
531	529 Prospect Avenue	South Pasadena	068626
532	511 Prospect Avenue	South Pasadena	068629
533	530 Orange Grove Avenue	South Pasadena	068635
534	822 Valley View	South Pasadena	068670
535	823 Bonita Drive	South Pasadena	068671
536	825 Bonita Drive	South Pasadena	068671
537	815 Bonita Drive	South Pasadena	068672
538	773 Bonita Drive	South Pasadena	68676
539	163 State Street	Pasadena	068777
540	1133 Avoca Avenue	Pasadena	68784
541	244 Arlington Drive	Pasadena	068793
542	935 Jane Place	Pasadena	068798
543	165 Hurlbut Street	Pasadena	068799
544	225 Fairview Avenue	South Pasadena	068829
545	5429 Poplar Boulevard	Los Angeles	068943
546	3226 Lowell Avenue	Los Angeles	069443
547	5514 Norwich Avenue	Los Angeles	069446
548	5511 Norwich Avenue	Los Angeles	069494
549	3430 Lowell Avenue	Los Angeles	069511
550	5502 Templeton Street	Los Angeles	069512

Table 1.2 List of Potential Surplus Properties

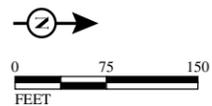
No.	Street Address	City	Caltrans Parcel No.
551	5506 Templeton Street	Los Angeles	069513
552	5514 Templeton Street	Los Angeles	069515
553	5515 Templeton Street	Los Angeles	069518
554	3730 Lowell Avenue	Los Angeles	069533
555	5511 Poplar Boulevard	Los Angeles	069536
556	4433 Maycrest Avenue	Los Angeles	069800
557	4423 Maycrest Avenue	Los Angeles	069802
558	887 Flores De Oro	South Pasadena	074835
559	852 Monterey Road	South Pasadena	074836
560	2018 Alpha Avenue	South Pasadena	075393
561	1010 1/2 Hope Street	South Pasadena	98046
562	1010 Hope Street	South Pasadena	980546

Source: Caltrans (July 2015).
 Caltrans = California Department of Transportation



LEGEND

- Potential Surplus Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\CDT_Parcels.mxd (12/2/2015)

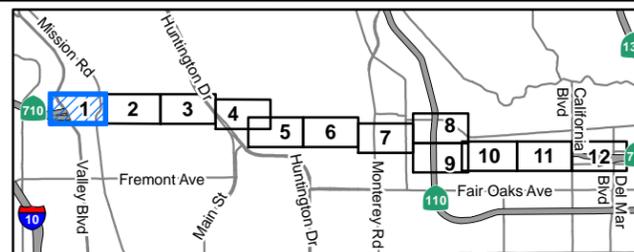
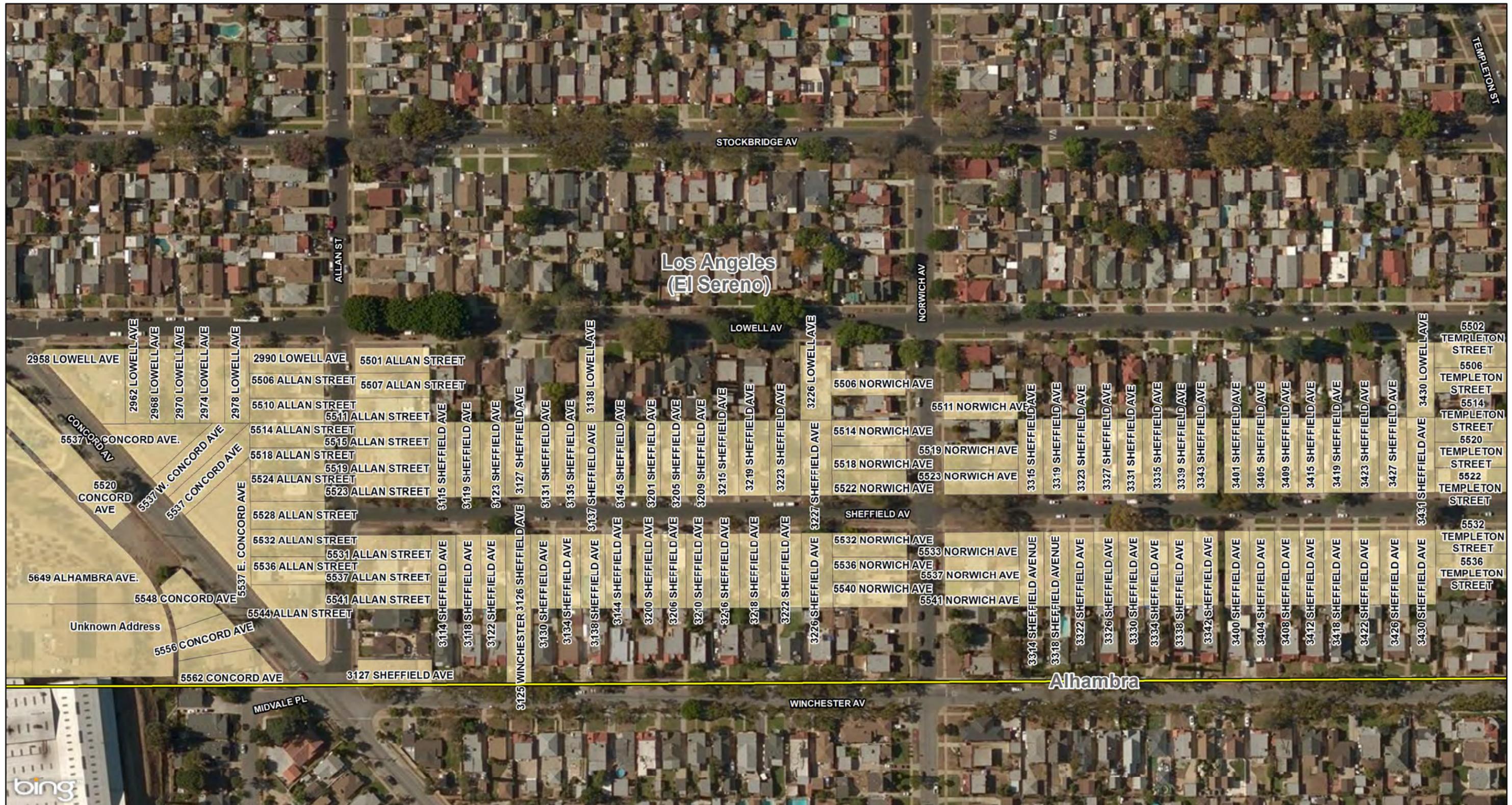


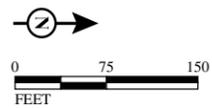
FIGURE 1-4
 Sheet 1 of 12

This page intentionally left blank



LEGEND

- Potential Surplus Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\CDT_Parcels.mxd (12/2/2015)

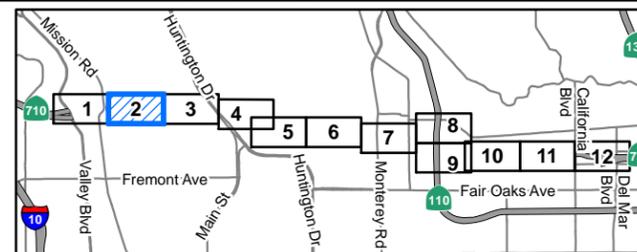
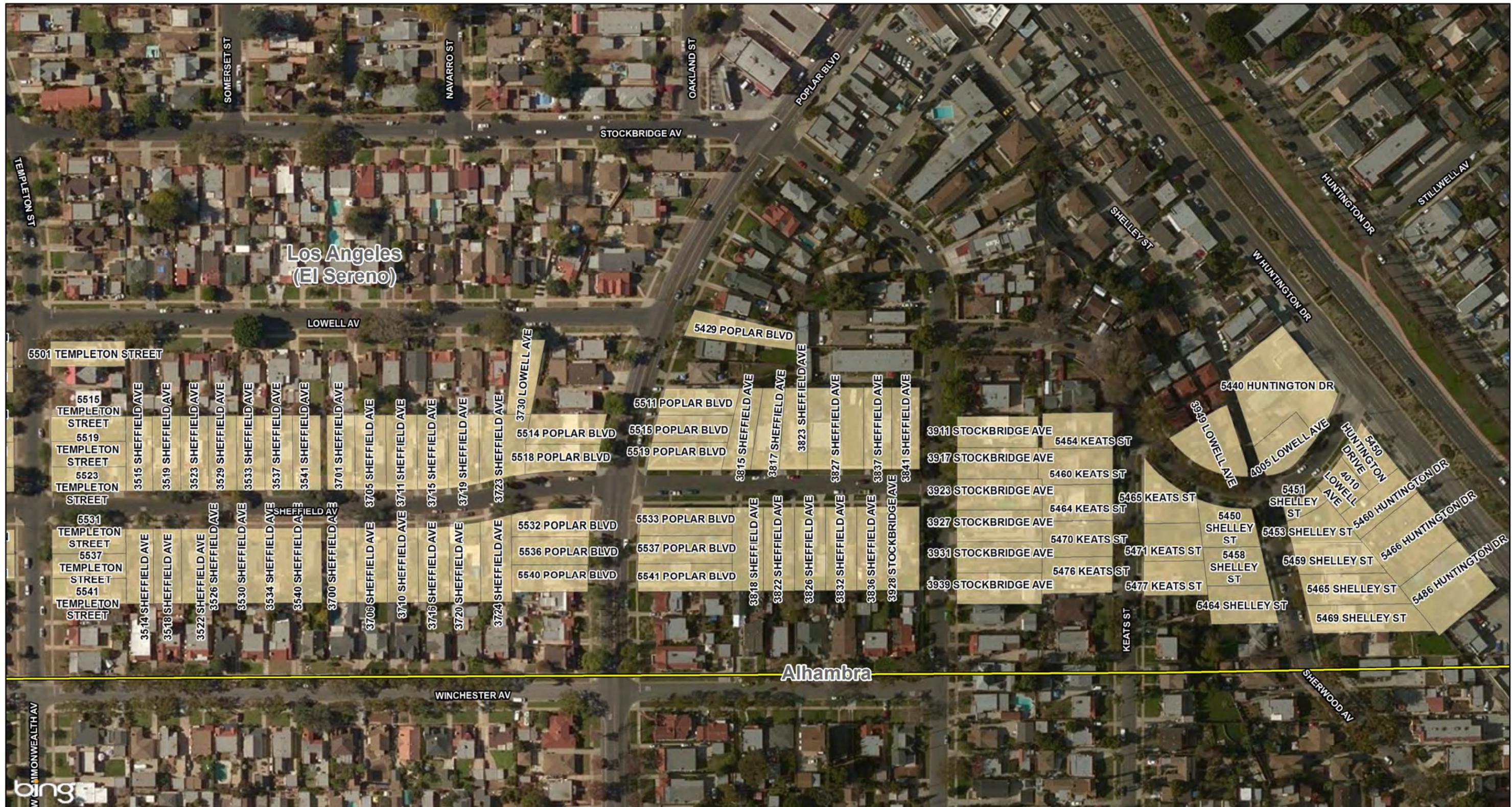


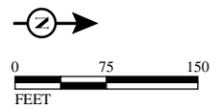
FIGURE 1-4
 Sheet 2 of 12

This page intentionally left blank



LEGEND

- Potential Surplus Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\CDT_Parcels.mxd (12/2/2015)

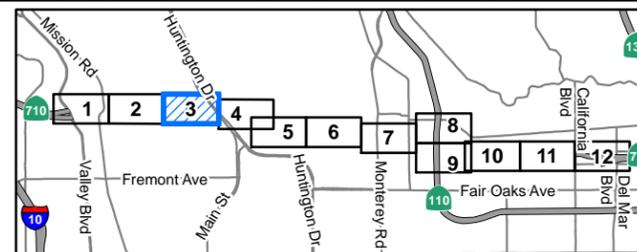
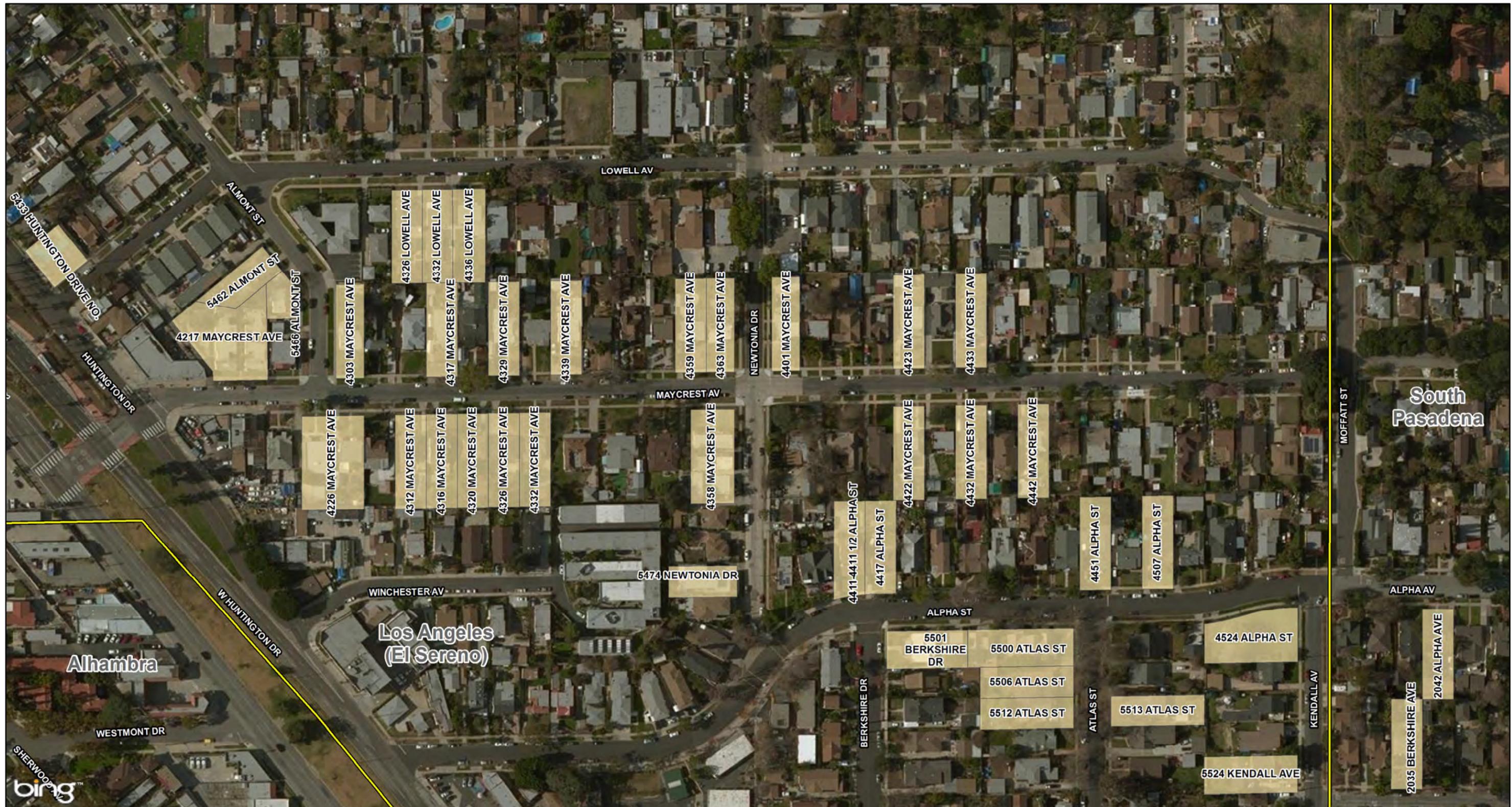


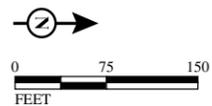
FIGURE 1-4
 Sheet 3 of 12

This page intentionally left blank



LEGEND

- Potential Surplus Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\CDT_Parcels.mxd (12/2/2015)

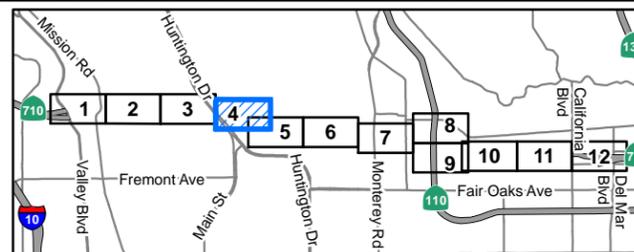
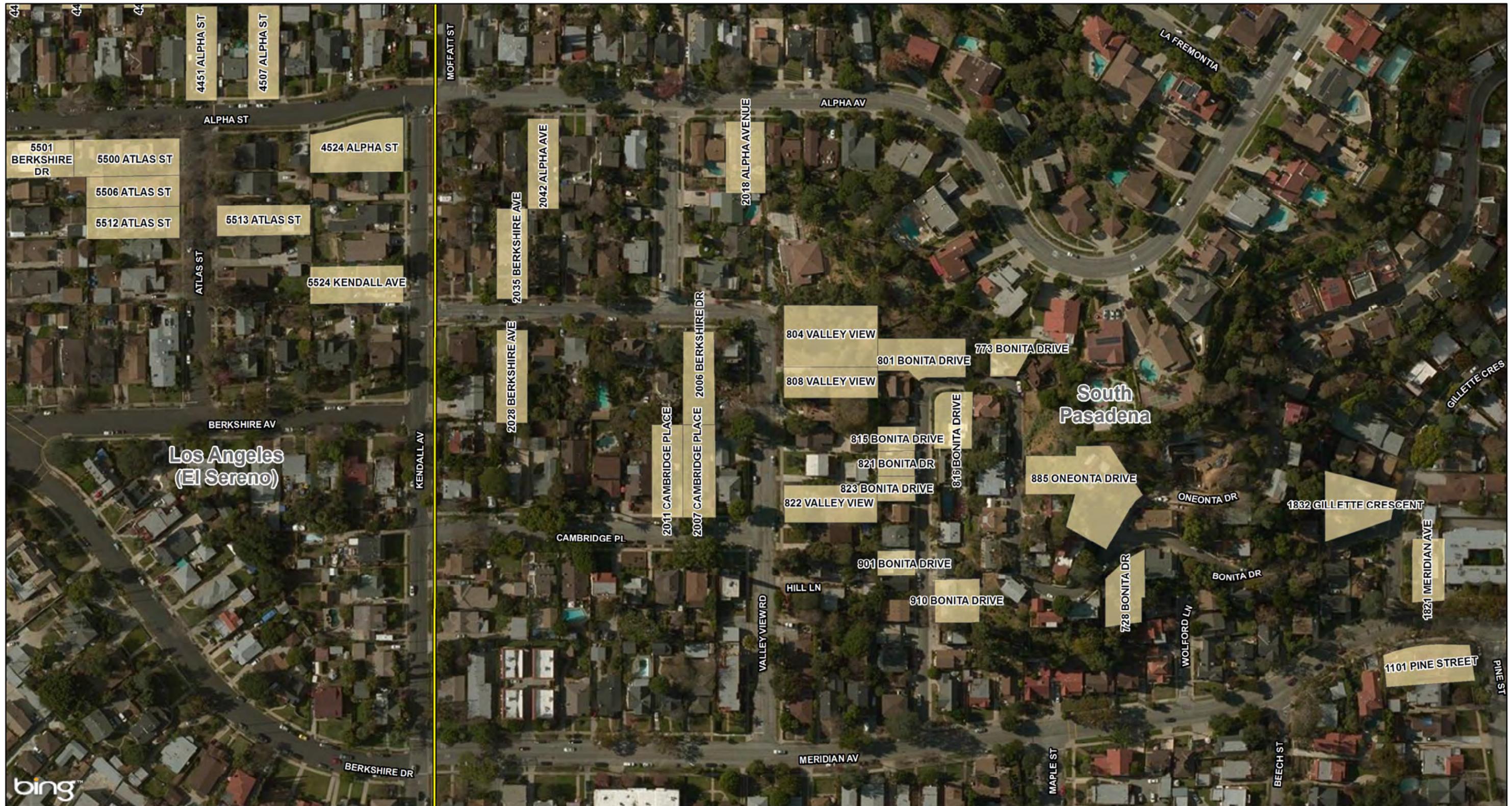


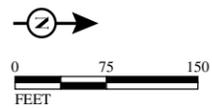
FIGURE 1-4
 Sheet 4 of 12

This page intentionally left blank



LEGEND

- Potential Surplus Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\CDT_Parcels.mxd (12/2/2015)

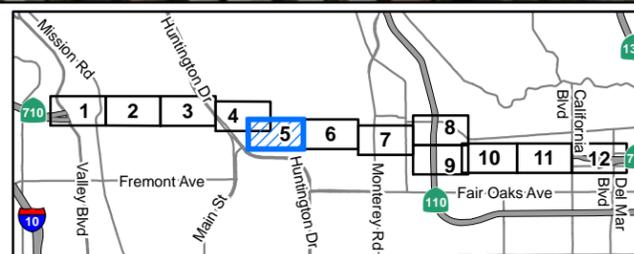


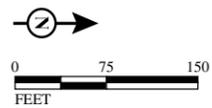
FIGURE 1-4
 Sheet 5 of 12

This page intentionally left blank



LEGEND

- Potential Surplus Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT\1502\GIS\CDT_Parcels.mxd (12/2/2015)

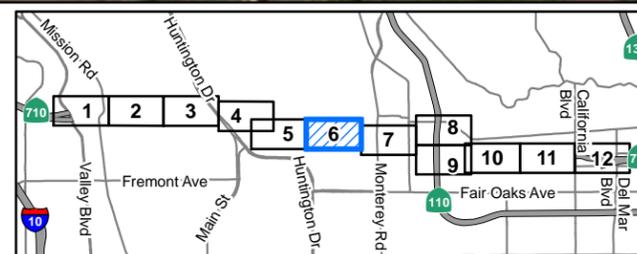
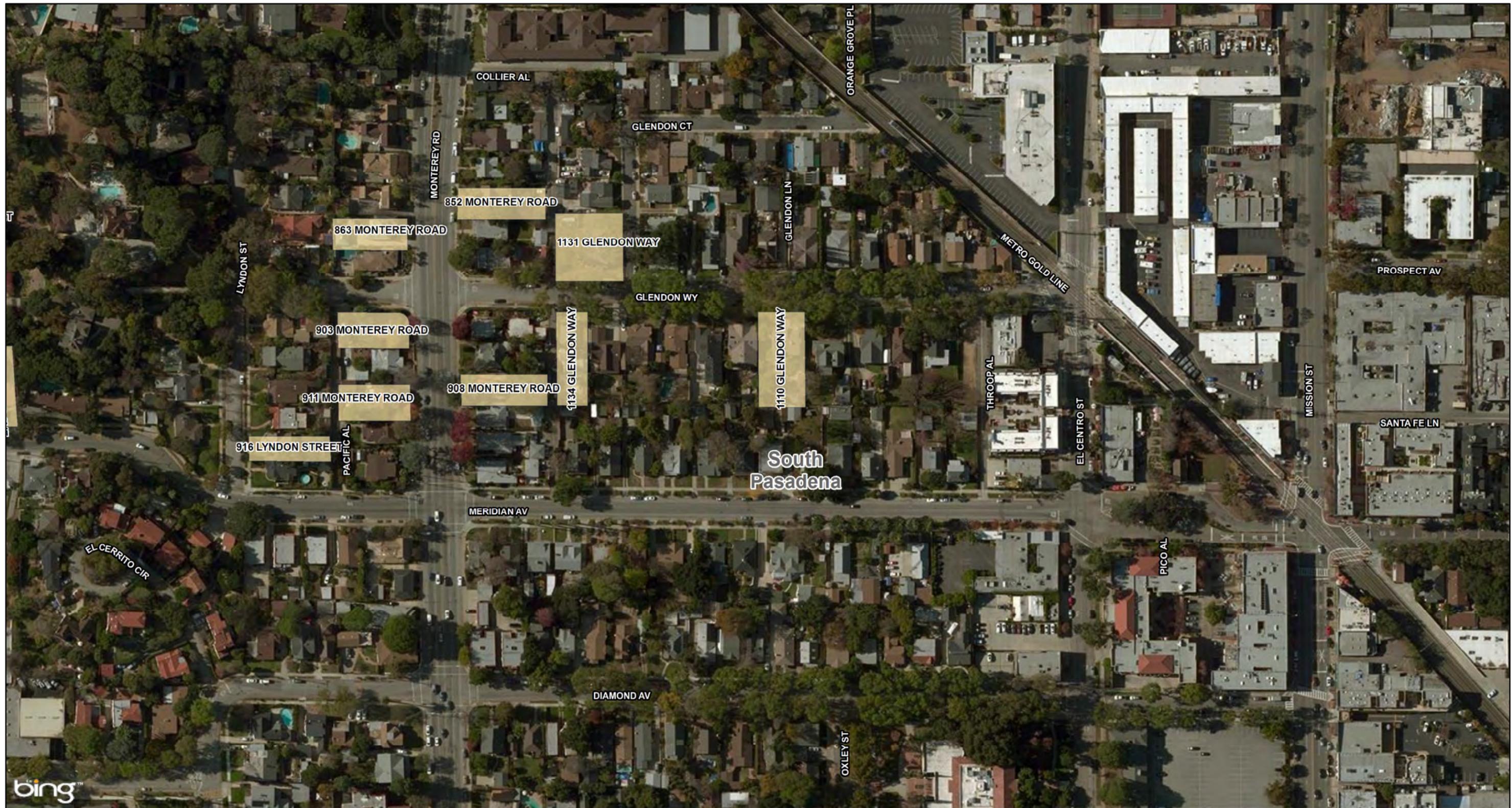


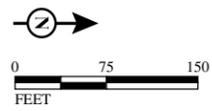
FIGURE 1-4
 Sheet 6 of 12

This page intentionally left blank



LEGEND

- Potential Surplus Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\CDT_Parcels.mxd (12/2/2015)

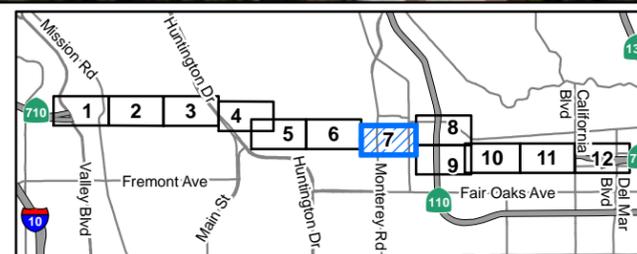
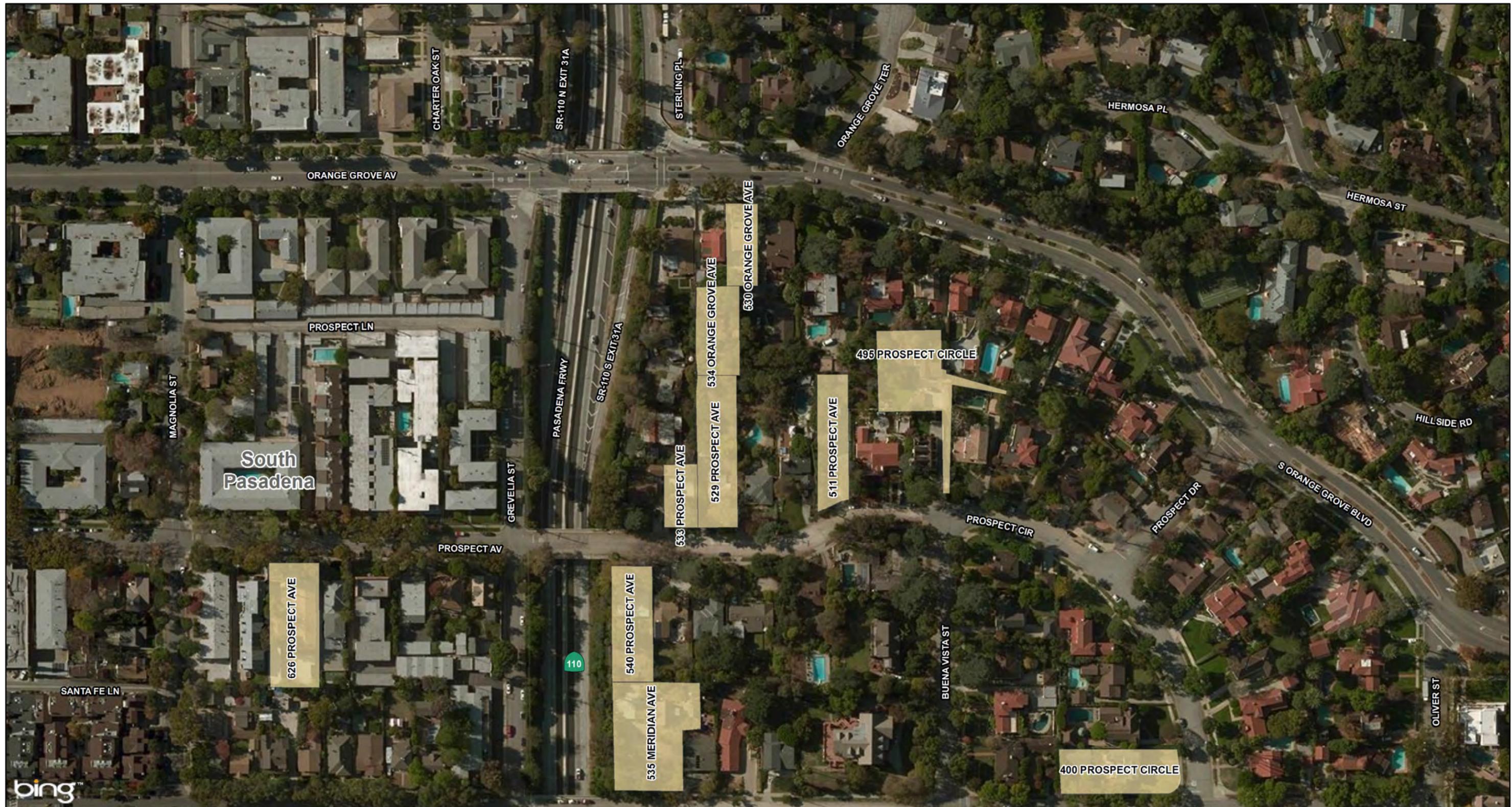


FIGURE 1-4
 Sheet 7 of 12

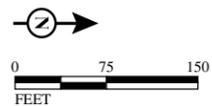
SR 710 Surplus Property Sale
 Potential Surplus Properties

This page intentionally left blank



LEGEND

- Potential Surplus Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\CDT_Parcels.mxd (12/2/2015)

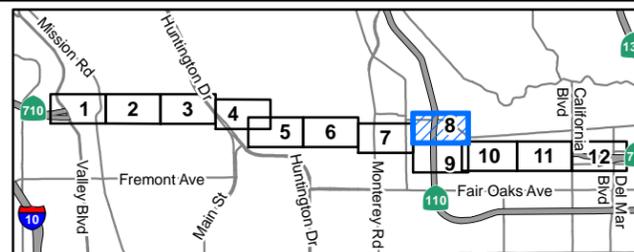
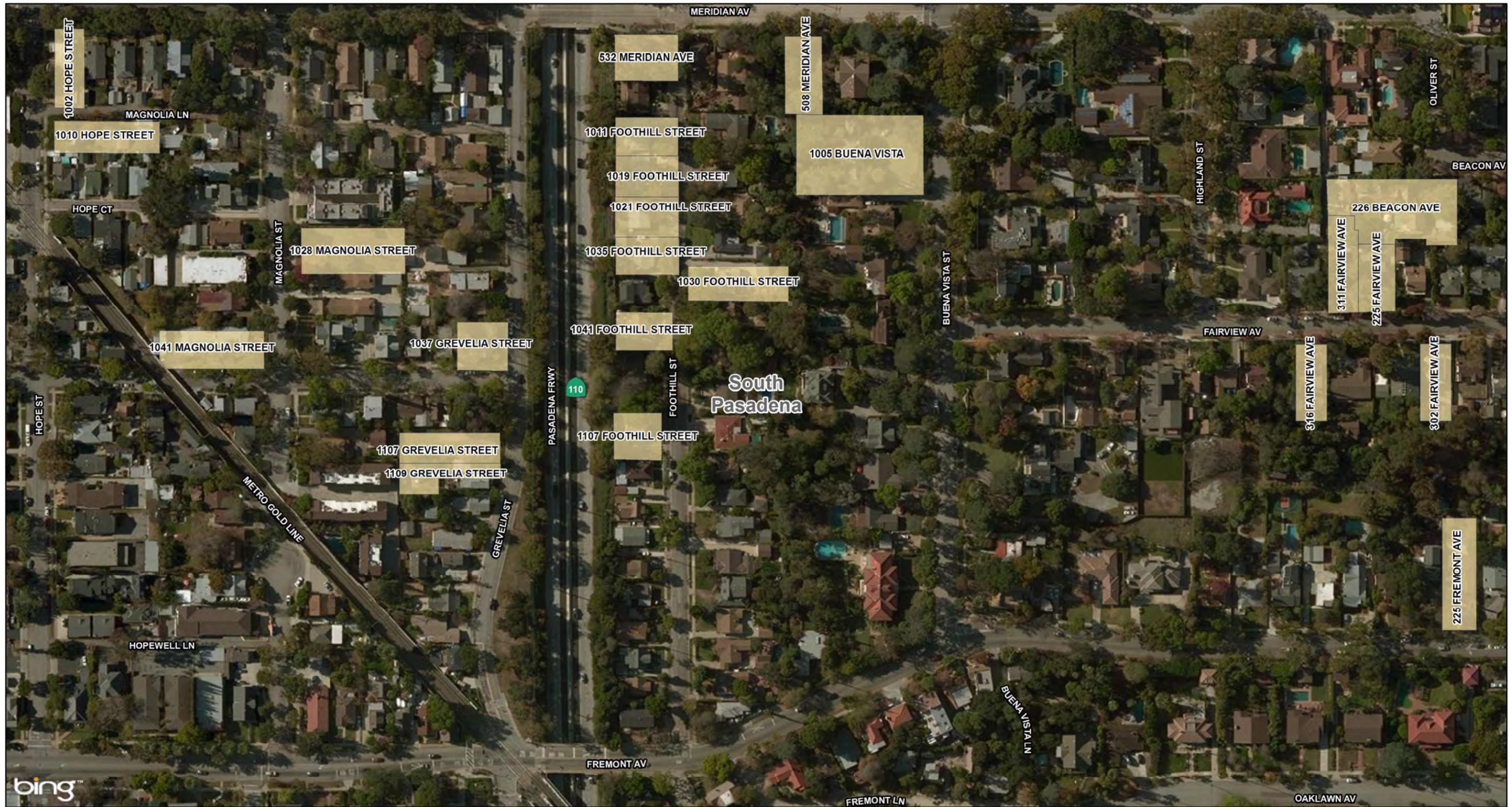


FIGURE 1-4
 Sheet 8 of 12

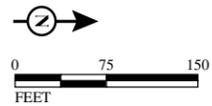
SR 710 Surplus Property Sale
 Potential Surplus Properties

This page intentionally left blank



LEGEND

- Potential Surplus Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
I:\CDT1502\GIS\CDT_Parcels.mxd (12/2/2015)

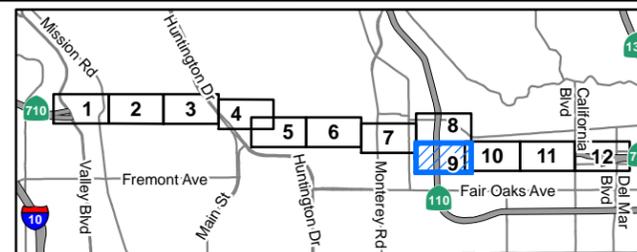
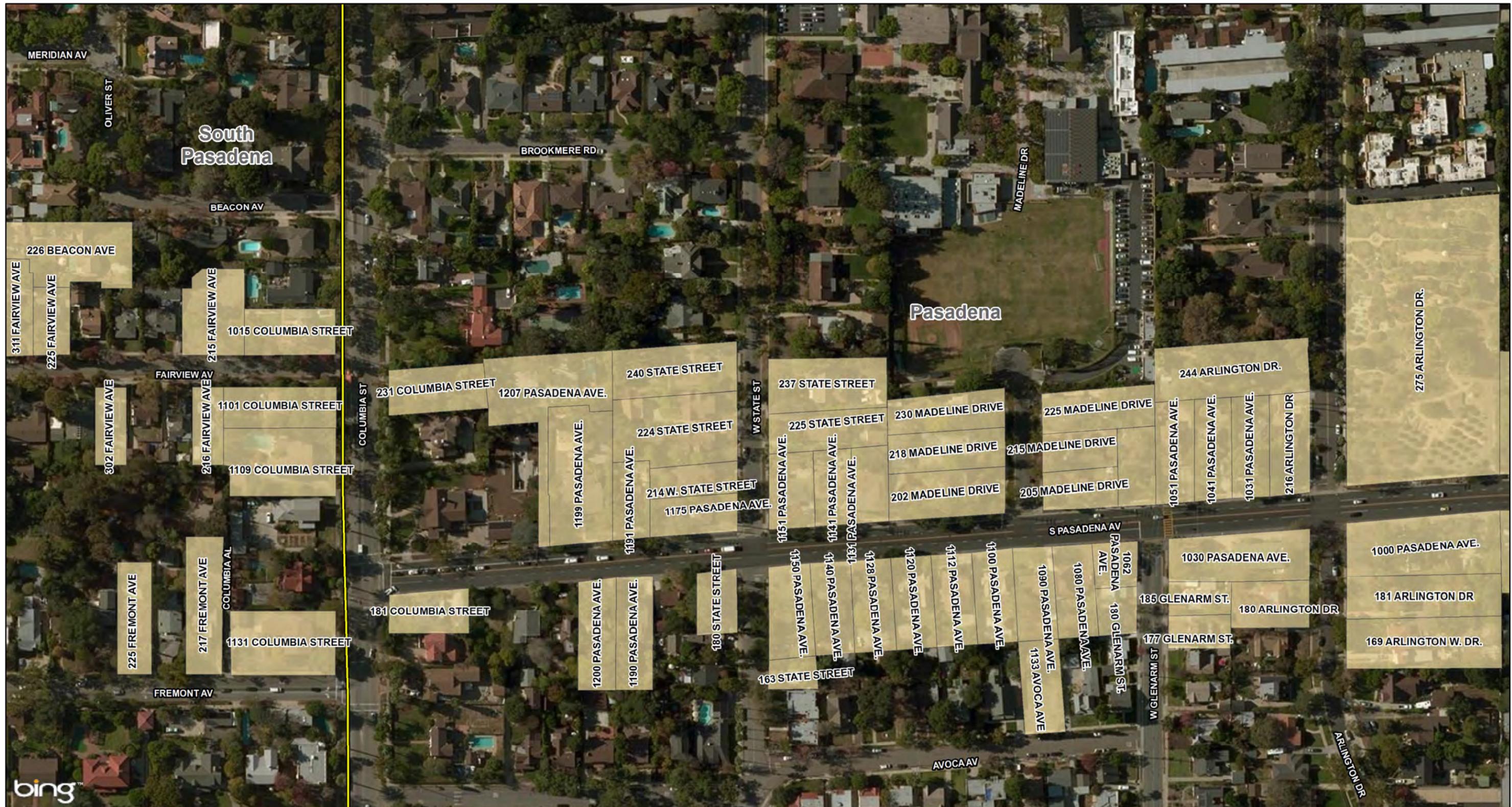
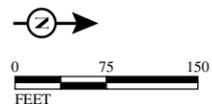


FIGURE 1-4
Sheet 9 of 12

This page intentionally left blank



LEGEND
 Potential Surplus Properties
 City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\CDT_Parcels.mxd (12/2/2015)

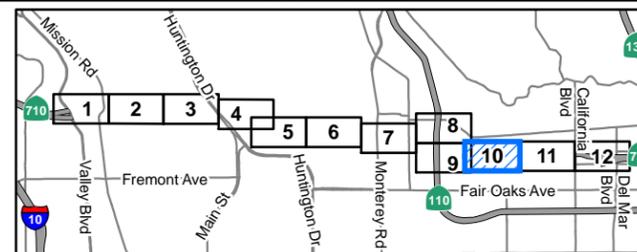
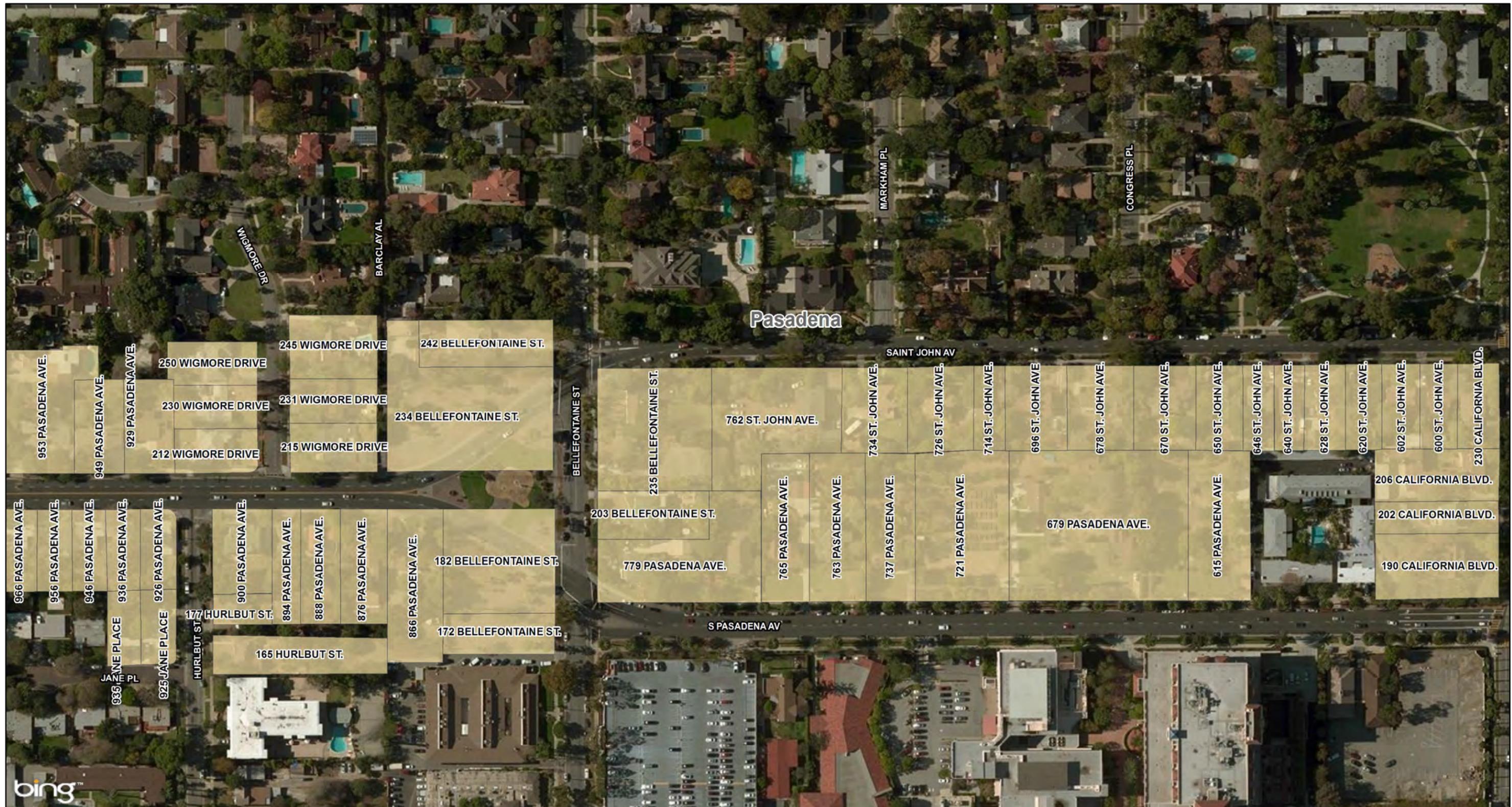


FIGURE 1-4
 Sheet 10 of 12

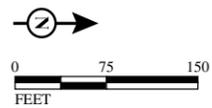
SR 710 Surplus Property Sale
 Potential Surplus Properties

This page intentionally left blank



LEGEND

- Potential Surplus Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\CDT_Parcels.mxd (12/2/2015)

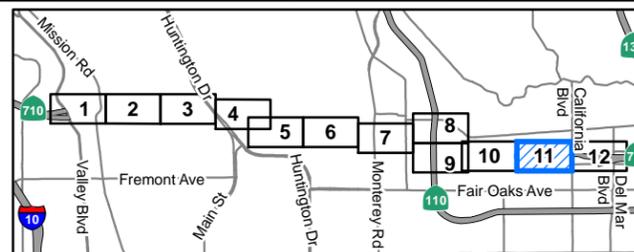
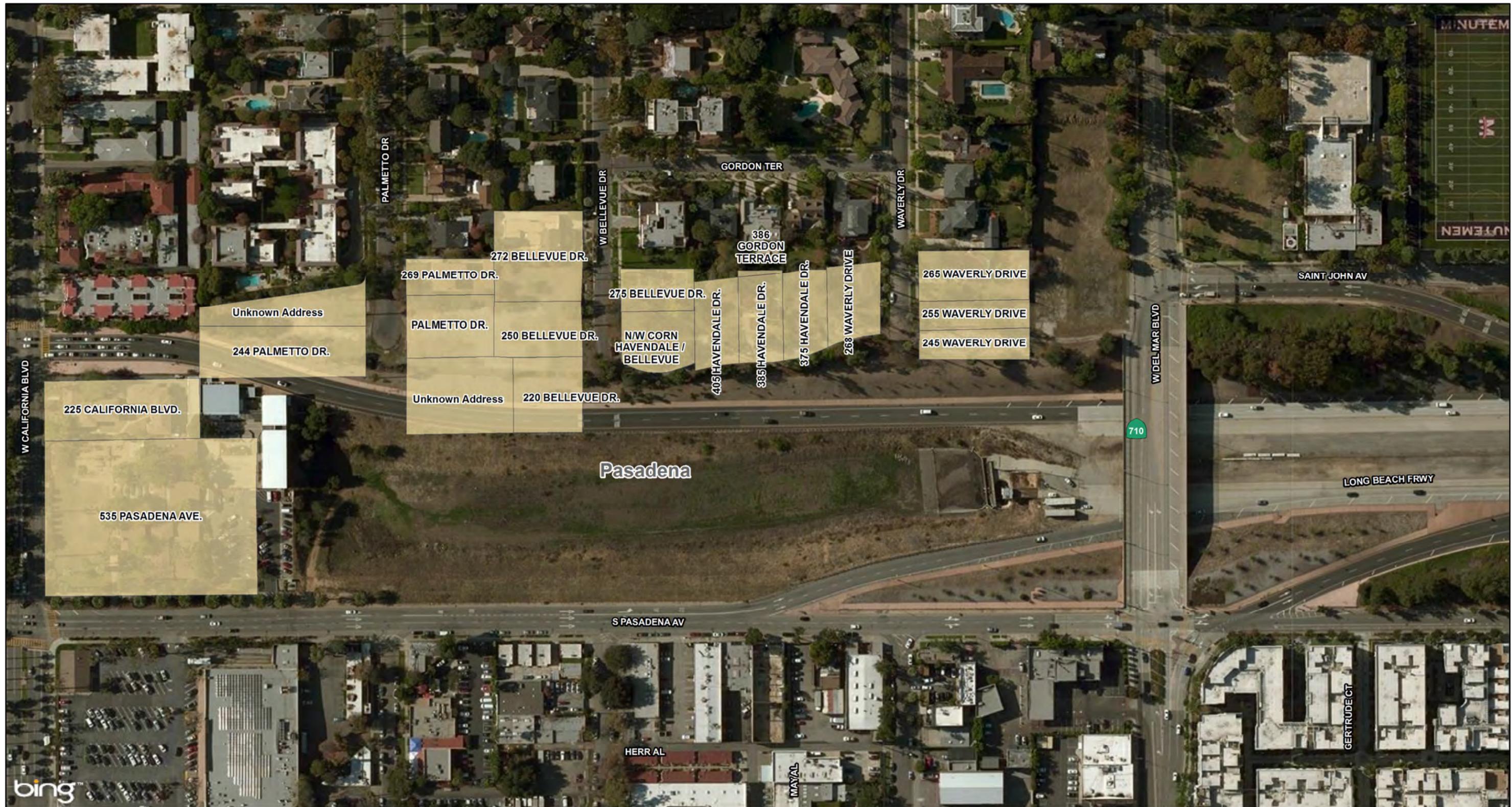


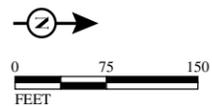
FIGURE 1-4
 Sheet 11 of 12

This page intentionally left blank



LEGEND

- Potential Surplus Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\CDT_Parcels.mxd (12/2/2015)

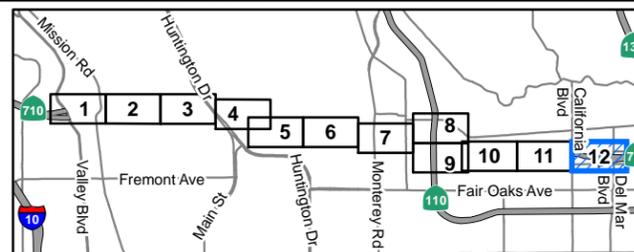


FIGURE 1-4
 Sheet 12 of 12

SR 710 Surplus Property Sale
 Potential Surplus Properties

This page intentionally left blank

1.5 Uses of This Environmental Impact Report

This document has been prepared by Caltrans as the Lead Agency in accordance with the requirements of the California Environmental Quality Act (CEQA) (Cal Pub. Res. Code Section 21000 et seq., as amended) and the implementation guidelines (Cal Code Regs., Title 14, Section 15000 et seq.). The environmental review process has been established to enable decision-makers, the public, and responsible agencies to evaluate an action in terms of its environmental consequences, to examine and implement methods of eliminating or reducing potential adverse impacts, and to consider alternatives to the proposed action. While CEQA requires that major consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other objectives, including economic and social goals, in determining whether and in what manner the project or action should be approved.

This page intentionally left blank

Chapter 2 Alternatives

As required by the California Environmental Quality Act (CEQA), in accordance with Section 15126.6 of the State CEQA Guidelines, an Environmental Impact Report (EIR) must address a range of alternatives that would feasibly accomplish most of the basic needs of the proposed project while avoiding or substantially lessening one or more of the significant environmental effects that are assessed in the EIR. The No Action Alternative (Alternative 1) must also be evaluated as part of the EIR [CEQA Guidelines Section 15126.6(e)], which allows decision-makers to compare the impacts of approving the proposed action with the impacts of not approving the action.

2.1 Alternative 1 – No Action (No Sale) Alternative

Alternative 1 assumes the proposed sales will not be adopted or implemented. The California Department of Transportation (Caltrans) would retain ownership of the properties and continue to make them available for rent throughout the Cities of Pasadena, South Pasadena, and Los Angeles. No change in environmental conditions should occur under Alternative 1 because the proposed sale would not take place. Thus, none of the impacts to the resource areas under the proposed sale would occur. However, under Alternative 1, Caltrans would be in violation of Streets and Highways Code 118.6, which mandates the agency to sell properties no longer needed for the current State Route 710 (SR-710) North Study. This alternative would not achieve the proposed sale's beneficial effects relative to increased home ownership rates, returning properties to the tax rolls, promoting fairness and social equity by making residential properties available to low- or moderate-income people that would otherwise be unaffordable, and would decrease the openness and transparency in business and government to the general public.

2.2 Alternative 2 – Action Alternative

Alternative 2, the proposed sale that is described in Chapter 1, assumes that the proposed sale is implemented. Alternative 2 will consist of selling surplus parcels that are no longer needed for the SR-710 North Study, pursuant to Streets and Highways Code Section 118.6, the Roberti Bill, Senate Bill (SB) 416, and the Affordable Sales Program (ASP) regulations. Alternative 2 consists of two variations (Variations A and B), which are described below; it is anticipated that both variations will meet the action's purpose and need. Under Variations A and B, the proceeds from the sale of

surplus properties, sold per ASP regulations, will be allocated to the SR-710 Rehabilitation Account for the rehabilitation of surplus single-family homes being sold to low- and moderate-income occupants for which lenders or government housing assistance programs require repairs.

2.2.1 Variation A – Sale Over 5-Year Period

Variation A assumes that the action is adopted and implemented. Under Variation A, the proposed sales will consist of selling the surplus parcels no longer needed for the SR-710 North Study over a 5-year period.

Government Code section 11346.3 and California Code of Regulations, title 1, sections 2002 and 2003 require a state agency promulgating a major administrative regulation to send a completed *Standardized Regulatory Impact Assessment* (SRIA) to the Department of Finance. According to the Affordable Sales Program SRIA, per the 2012 Bureau of State Audits Report (2012 Audit),¹ there are 398 single-family and multifamily residences to be sold after the ASP regulations are finalized. Table 2.1 depicts the number of residential surplus properties estimated to be sold over 5 years.

Table 2.1 Number of Properties Estimated to be Sold Over 5-Year Implementation Period

Fiscal Year	No. of Properties Estimated to be Sold under ASP
2015/2016	42
2016/2017	68
2017/2018	88
2018/2019	90
2019/2020	110

Source: *Standardized Regulatory Impact Assessment* (SRIA) Proposed Affordable Sales Program Regulation (05/08/2015), Page 7.

The ASP regulations were finalized on July 2016. The escrow close date is anticipated to begin in the winter of 2016 or early 2017 for non-historic properties in Phase 1 (1A and 1B) and later in mid-2017 for the historic Phase 2 and Phase 3 properties.

¹ California State Auditor. August 2012, California Department of Transportation. Report 2011-2010, <http://www.bsa.ca.gov/pdfs/reports/2011-120.pdf>.

Implementation of Variation A would result in meeting the purpose and need of the proposed sale by complying with SB 416, the Roberti Bill, ASP regulations, and the Streets and Highways Code. The sale of single-family and multifamily residences currently owned by Caltrans would also have the beneficial effect of increasing home ownership rates, returning properties to the tax rolls, promoting fairness and social equity because it would make residential properties available to low- or moderate-income people that would otherwise be unaffordable.

Given that the range of alternatives currently under study in the SR-710 North Study Draft Environmental Impact Report/Draft Environmental Impact Statement (DEIR/DEIS) do include a subterranean tunnel alternative (the Freeway Tunnel Alternative), two options for each sale variation are being presented that pertain to subsurface property rights. Under Variation A Option 1, the properties would be sold over a 5-year period as proposed, but subsurface rights to a tunnel easement would be retained by Caltrans. Under Variation A Option 2, all subsurface property rights would be conveyed with the properties. In the event the tunnel option is selected for implementation, Caltrans would at that time acquire any necessary subsurface easements through the standard right-of-way acquisition process.

2.2.2 Variation B – Immediate Sale

Variation B consists of selling all at once the surplus parcels no longer needed for the SR-710 North Study. The parcels deemed surplus will be put on the market simultaneously for sale as soon as practicable rather than spaced over the 5-year period.

Implementation of Variation B would result in meeting the purpose and need of the action.

Variation B also includes two options that pertain to subsurface property rights. Variation B Option 1 would sell the parcels deemed surplus immediately while retaining subsurface rights to a tunnel easement. Variation B Option 2 would convey all subsurface property rights with the parcels. In the event the SR-710 North Study Freeway Tunnel Alternative is selected for implementation, Caltrans would at that time acquire any necessary subsurface easements through the standard right-of-way acquisition process.

2.3 Alternatives Considered but Not Analyzed in Detail

The following discussion has been prepared in accordance with the requirements of CEQA Guidelines Section 15126.6(c), which requires that an EIR identify alternatives that were considered by the lead agency but not considered for further evaluation. According to the CEQA Guidelines, the following factors may be used to eliminate alternatives from detailed consideration: (a) the alternative's failure to meet most of the basic project objectives, (b) the alternative's infeasibility, or (c) the alternative's inability to avoid significant environmental impact. Under Streets and Highways Code Section 118.6, Caltrans is mandated to relinquish ownership of the surplus properties in the SR-710 corridor no longer needed for the SR-710 North Study. As a result, no other action alternatives were considered. However, CEQA mandates that a no build/no action alternative be considered, and therefore is included here.

2.4 Environmentally Preferred Alternative

This section summarizes the environmental advantages and disadvantages associated with the action alternatives. Based upon this discussion, the environmentally superior alternative is selected as required by CEQA.

CEQA does not provide specific direction regarding the methodology of comparing alternatives and the proposed project. Each project must be evaluated for the issues and impacts that are most important; this will vary depending on the project type and the environmental setting. Issue areas that are generally given more weight in comparing alternatives are those with significant long-term impacts. Impacts that are short-term (e.g., construction-related impacts) or those that can be mitigated to less than significant levels are generally considered less important.

This comparison is designed to satisfy the requirements of the CEQA Guidelines Section 15126.6 (2), Evaluation of Alternatives, which states that:

“The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

The CEQA Guidelines (Section 15126.6 (e)(2)) also state that “If the environmentally superior alternative is the “No Project” alternative, the EIR would also identify an environmentally superior alternative among the other alternatives.”

In accordance with CEQA Guidelines Section 15126.6(d), this EIR provides sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed action and the other alternative. The Project Development Team (PDT) chose a preferred alternative after consideration of the merits of the alternatives, the environmental impacts, and public input provided through the environmental review process. Public and agency comments and any expressed concerns regarding the proposed Action Alternative were given serious consideration.

Alternative 2 (Action), Variation A Option 1 has been identified as the ‘Preferred Alternative.’ This alternative would best fulfill the action’s purpose and need; Alternative 1 (No Action) and Alternative 2, Variation B, Options 1 and 2, as discussed below would not fulfill the action’s purpose and need. The public expressed support of Alternative 2 over Alternative 1. Although Alternative 1 would not result in the impacts that would occur under the proposed Action Alternative, this alternative would not achieve the identified objective of the action. Caltrans would retain ownership of the properties and continue to practice its role in property management. Alternative 2, Variation A Option 1 was also selected as the Preferred Alternative because it provides much greater improvement in right of way relinquishment, at a marginal increase in time, compared with Alternative 2, Variation B Options 1 and 2. As stated in the SRIA, the vast majority of the parcels will be able to sell regardless of which alternative is selected in the SR-710 North Study.

This page intentionally left blank

Chapter 3 Environmental Setting

This section provides a general overview of the environmental setting for the State Route 710 (SR-710) Surplus Property Sales (Proposed Action). More detailed descriptions of the environmental setting that are germane to each environmental issue area can be found in Chapter 4.0, Environmental Analysis.

Efforts to complete the SR-710 corridor began in 1933 when Legislative Route 167, later renamed State Route 7 (SR-7), was planned from San Pedro east to Long Beach and north to the vicinity of Monterey Park. In 1959, the proposed northern limits of SR-7 were extended to the planned Foothill Freeway (now Interstate 210 [I-210]). SR-7 from Long Beach to Interstate 10 (I-10) was constructed and incorporated into the Interstate Highway System as Interstate 710 (I-710) in 1983. SR-7 from I-10 to Valley Boulevard (southern stub) and from I-210 to I-210/SR-710/State Route 134 (SR-134) interchange (northern stub) were designated SR-710 in 1984.

Over the years, planning efforts continued for SR-710 to evaluate alternatives and address community and agency concerns, eventually leading to the issuance of a Record of Decision (ROD) in 1998 by the Federal Highway Administration (FHWA) for a surface freeway that would connect the southern stub to the northern stub. Some of the communities that would be affected by the proposed surface freeway extension initiated litigation, and FHWA rescinded the ROD in 2003. FHWA cited changes in project circumstances such as funding uncertainty, the opening of the Metro Gold Line to Pasadena, and requiring a more thorough evaluation of the feasibility of a bored tunnel as reasons for rescinding the ROD.

In 2006, Metro completed a feasibility assessment of extending SR-710 from Valley Boulevard to I-210. The feasibility evaluation was primarily focused on deep subterranean bored or mined tunnel construction methods.

In June 2010, the Los Angeles County Metropolitan Transportation Authority (Metro), in coordination with Caltrans, authorized moving forward with an environmental review phase for the SR-710 North Study.

3.1 Regional and Local Setting

The study area is centrally located within the extended urbanized area of Southern California. The County of Los Angeles (County) is approximately 4,000 square miles (sq mi) in area and consists of 88 incorporated cities (including the Cities of

Pasadena, South Pasadena, and Los Angeles). Los Angeles County stretches along 75 miles (mi) of the Pacific Coast and is bordered by Kern County to the north, Ventura County to the west, San Bernardino County to the east, and Orange County to the east and south.

The County of Los Angeles was established on February 18, 1850, as one of the 27 original counties in California. The name is derived from the area known as Los Angeles, which was already a large community at the time, and was designated as the “seat” of the County government. Soon after, the City of Los Angeles Police Department was formed, and the first public school system was established in the area. In 1852, a five-member Board of Supervisors was created, and the County continued to grow over the next few decades, establishing more schools (1852), the first library (1859), a Board of Health (1863), a Board of Education (1869), and the first publication of the *Los Angeles Times* (1881). In 1905, the County approved the Owens Valley water project that would build an aqueduct from Owens Valley to Los Angeles. By 1913, the aqueduct began delivering water to the County. Over the next century, the area continued to grow in population and became a major regional economic center. As a result, infrastructure needs grew (e.g., ports, highways, the Colorado River Aqueduct) and regulatory agencies were formed (e.g., Los Angeles County Flood Control District, Los Angeles Air Pollution Control Board).

The neighborhood referred to as El Sereno includes a group of smaller neighborhoods (i.e., El Sereno, Emery Park, Hillside Village, Rose Hills, Sierra Park, and University Hills) in the City of Los Angeles. El Sereno is bordered by the City of Alhambra to the east, the neighborhood of Lincoln Heights to the west, the neighborhoods of Arroyo Seco and Highland Park and the City of South Pasadena to the north, and the neighborhood of Boyle Heights and the unincorporated community of East Los Angeles to the south. El Sereno is approximately 4.9 sq mi in size and is located approximately 1 mi east of Interstate 5 (I-5). Figure 1-2 illustrates the locations of the neighborhood of El Sereno, the City of Pasadena, and the City of South Pasadena. According to the Northeast Los Angeles Community Plan and the City of Los Angeles General Plan, residential uses are the primary land use in El Sereno, comprising approximately 52 percent of the land within the community, followed by public uses (15 percent). Approximately 16 percent of the land in the community is vacant, the majority of which consists of undevelopable hillsides.

The City of Pasadena is bordered by the City of La Cañada Flintridge and the unincorporated community of Altadena to the north, the Cities of Sierra Madre and

Arcadia to the east, the Cities of South Pasadena and San Marino and the unincorporated communities of San Pasqual and East Pasadena to the south, and the Cities of Los Angeles and Glendale to the west. The City of Pasadena is approximately 23.1 sq mi in size and is located approximately 4 mi from the northern stub of SR-710.

The City of Pasadena was incorporated in 1886. In the ensuing decade, amenities such as sewers, paved streets, and electric street lighting were installed. The popularity of the region drew visitors from across the country. Pasadena eventually became a key stop along the Atchison, Topeka and Santa Fe Railway, which led to an explosion of population growth. Increased population growth and new development caused concern for preserving the unique quality of life in Pasadena. An awakened respect for the City's architectural treasures led to the renovation of historic homes and buildings throughout Pasadena. This emphasis on preservation of the City's historic architecture is apparent in Old Pasadena, where the City's business district first started. Old Pasadena has transformed into a restaurant and entertainment center, and is a major attraction of Southern California.

The City of South Pasadena is bordered by the City of Pasadena to the north, the City of San Marino to the east, the Cities of Los Angeles and Alhambra to the south, and the City of Los Angeles to the west. The City of South Pasadena is approximately 3.4 sq mi in size and is located east of State Route 110 (SR-110) and approximately 2 mi south of I-210. South Pasadena is now considered one of the best preserved cities in California, maintaining a small-town quality in the scale of its buildings, its residential streetscapes, and its historic commercial core. Regional access to the City of South Pasadena is provided by SR-134, I-210, and I-710. Only SR-110 passes through South Pasadena.

Overall, the action area cities are older, substantially urbanized communities where existing development and land use patterns have been in place for many years.

3.2 Area and Local Plans

Several State and regional plans and programs apply to the action area. In addition, each affected jurisdiction has developed general plan documents that are intended to guide long-term physical development. State law requires that the general plan include the following elements at a minimum: land use, housing, circulation, noise, open space, conservation, and public safety.

3.2.1 Local Agency Plans

3.2.1.1 City of Los Angeles (El Sereno)

The City of Los Angeles' General Plan includes all seven required elements. A Northeast Los Angeles Community Plan, adopted separately from the General Plan elements, was also approved to identify specific actions the City of Los Angeles will undertake to implement goals and policies contained in the General Plan. The Northeast Los Angeles Community Plan and the City of Los Angeles General Plan do not contain any goals or policies relevant to the proposed action.

3.2.1.2 City of Pasadena

The City of Pasadena's General Plan includes all seven required elements. Under the Housing Element, there are two objectives and policies that are relevant to the proposed action and are further discussed in Chapter 4.

3.2.1.3 City of South Pasadena

The City of South Pasadena's General Plan includes all seven required elements. The Mission Street Specific Plan was adopted by the City of South Pasadena City Council in 1996 to address the impacts of the Gold Line on Mission Street and implement its vision of Mission Street as South Pasadena's pedestrian-oriented, historic shopping street. The Mission Street Specific Plan and the City of South Pasadena General Plan contain goals and policies relevant to the proposed action and are further discussed in Chapter 4.

Chapter 4 Environmental Analysis

Chapter 4 describes the existing affected environment in the study area for the State Route 710 (SR-710) Surplus Property Sales. The affected environment is the base environmental condition on which environmental effects of the action alternatives are evaluated.

The sections in Chapter 4 include the regulatory setting applicable to the environmental topic, the methodology of impact analysis, a description of the affected environment, environmental effects resulting from Alternative 1 (No Action/No Sale Alternative) and Alternative 2 (Action Alternative), and measures to avoid, minimize, or mitigate adverse impacts of the alternatives. Tables and figures are included throughout Chapter 4 to support the impact analyses.

Sections 4.1 through 4.4 in this Final Environmental Impact Report (FEIR) analyze the permanent and temporary direct and indirect impacts of Alternatives 1 and 2. The evaluation of the potential effects of Alternatives 1 and 2 provided in this chapter was conducted by comparing the proposed alternatives to the baseline conditions. The baseline used in the impact evaluation is the existing conditions in the study area.

As part of the scoping and environmental analysis carried out for the action, the following environmental issues were considered, but no adverse impacts were identified. This FEIR addresses the issues determined to be potentially significant, pursuant to input from residents in the community, responses to the Notice of Preparation (NOP), and comments on the Draft Environmental Impact Report (DEIR) that were released for public circulation on July 8, 2015. As a result, there is no further discussion about these issues in this document.

- **Visual/Aesthetics:** The proposed action does not propose a physical change to the environment. While the sale of the properties removes them from the State right-of-way, the sale in itself does not remove the properties from or otherwise alter the viewshed. Therefore, there are no recognized environmental concerns related to aesthetics for any of the alternatives or variations of the SR-710 Surplus Property Sales.
- **Farmlands/Timberlands:** There are no timberlands or prime, unique, or soils of local significance for farmlands within the action area. Therefore, there are no recognized environmental concerns related to farmlands and timberlands for this proposed sale.

- **Air Quality:** The proposed action will not affect air quality.
- **Biology:** The proposed action will not affect plants and animals, including rare, threatened, or endangered species. The proposal does not have the potential to degrade the quality of the environment, substantially reduce fish or wildlife habitat, cause fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community.
- **Geology/Soils/Seismic Topography:** The proposed action will not affect any geologic or soil conditions.
- **Hydrology and Floodplain:** The proposed action will not conduct any work within any floodplain or generate additional non-porous flat surfaces.
- **Water Quality and Storm Water Runoff:** The proposed action will not affect water quality and storm water runoff.
- **Mineral Resources:** The proposed action will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State, nor would it result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.
- **Noise/Vibration:** This action will not raise traffic noise or cause a substantial noise increase. The action will not result in an increase in existing noise and vibration levels or cause exposure of people to severe noise and vibration levels.
- **Public Services:** The action will not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or a need for new or physically altered government facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services.
- **Recreation:** The action will not have an effect on recreational resources.
- **Traffic and Transportation/Pedestrian and Bicycle Facilities:** The scope of the proposed action is to sell surplus properties; therefore, streets, sidewalks, and bicycle facilities will not be affected as part of this action.
- **Utilities/Emergency Services:** The proposed action will not disturb any utilities, affect emergency services, or require temporary street closures/detours.
- **Coastal Zone:** The parcels are not located in a Coastal Zone. As such, no coastal resources will be affected by the proposed sale.
- **Paleontology:** The proposed action will not disturb any native soil; therefore, no paleontological resources will be affected.

- **Wetlands and Other Waters:** No wetlands or other waters are located within the action limits; therefore, no wetlands or other waters will be affected.

4.1 Land Use

The potential for the proposed action to result in impacts related to land use is provided in this section based on analyses in the *Community Impact Assessment* (CIA; LSA 2015) and the *Final Relocation Impact Report* (FRIR; Caltrans 2016).

4.1.1 Existing Conditions

The study area for existing and General Plan land uses that could potentially be directly affected by the proposed action was defined as the portions of the City of Pasadena, the City of South Pasadena, and the neighborhood of El Sereno in the City of Los Angeles in which the potential surplus properties are located.

4.1.1.1 Existing and Planned Land Use

The land use study area and the existing land uses on the potential surplus properties by jurisdiction are shown on Figure 4-1. The existing land uses in the study area described in Table 4.1 include a mix of residential, commercial, institutional, and vacant uses.

Table 4.1 Existing Land Uses

Land Use	Acreage ¹	Percent ¹
El Sereno		
Commercial	0.7	1.5
Industrial	10.8	21.7
Open Space	1.3	2.6
Residential	30.4	61.2
Vacant	6.5	13.1
Total	49.7	100.0
Pasadena		
Institutional	2.0	4.7
Residential	31.1	73.3
Vacant	9.3	22.0
Total	42.4	100.0
South Pasadena		
Residential	15.6	91.2
Vacant	1.5	8.8
Total	17.1	100.0

Source: *Community Impact Assessment* (LSA 2015).

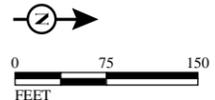
¹ Total may not add up due to numbers being rounded.

This page intentionally left blank



bing™

- LEGEND
- | | | |
|-------------------|---------------|---------------|
| Existing Land Use | Recreation | City Boundary |
| Residential | Institutional | |
| Commercial | Vacant | |
| Industrial | | |



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\EXLU.mxd (12/2/2015)

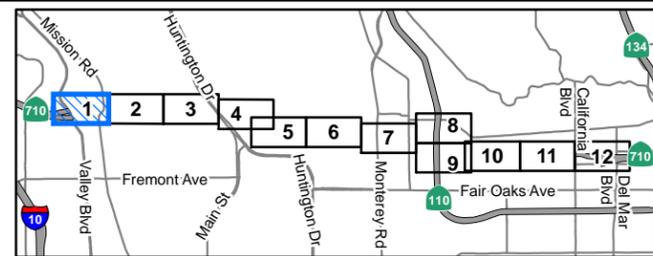
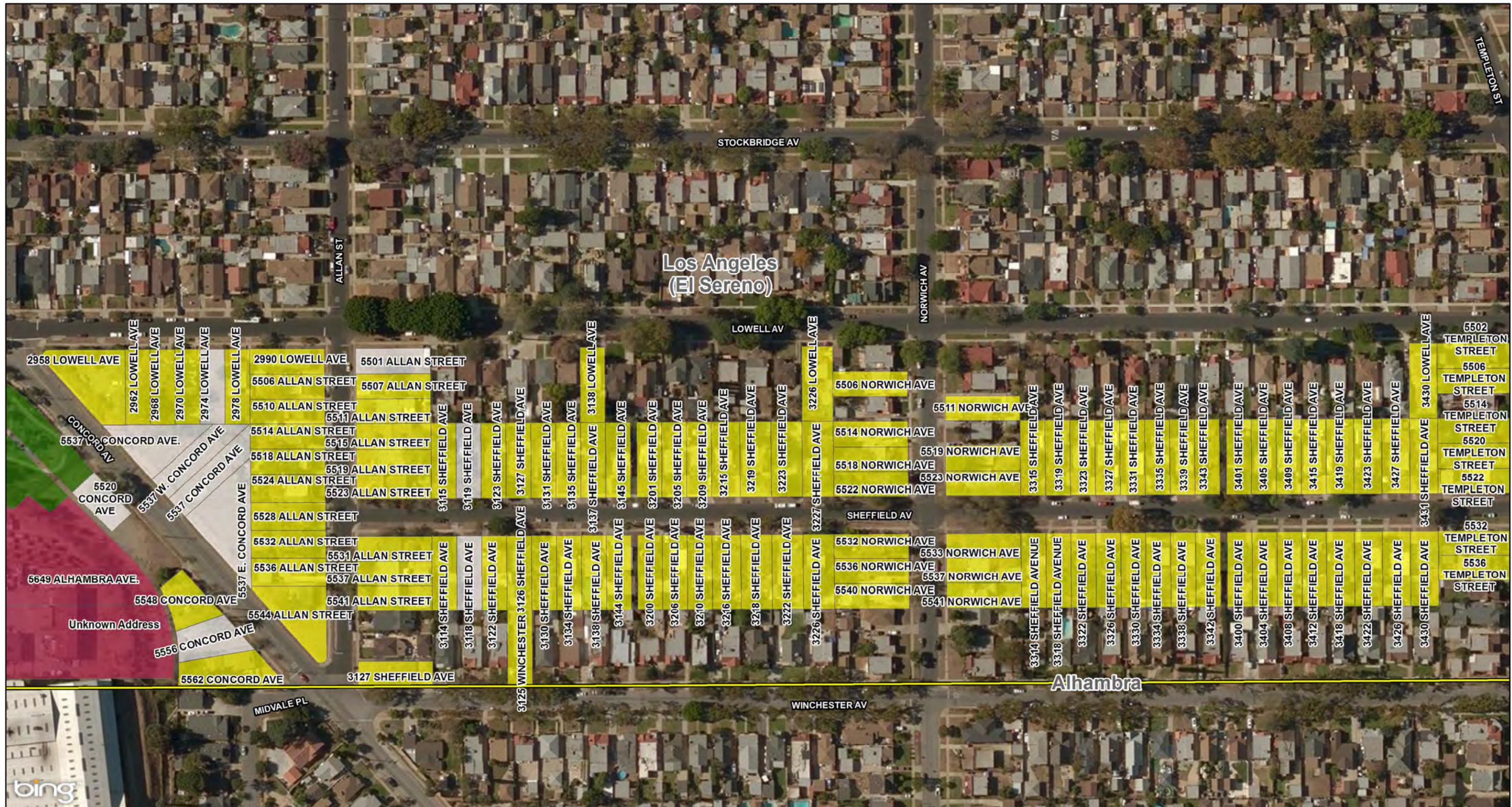


FIGURE 4-1
 Sheet 1 of 12

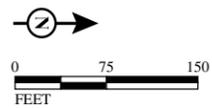
SR 710 Surplus Property Sale
 Existing Land Uses

This page intentionally left blank



LEGEND

- | | | |
|--|--|---|
| Existing Land Use | Recreation | City Boundary |
| Residential | Institutional | |
| Commercial | Vacant | |
| Industrial | | |



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\EXLU.mxd (12/2/2015)

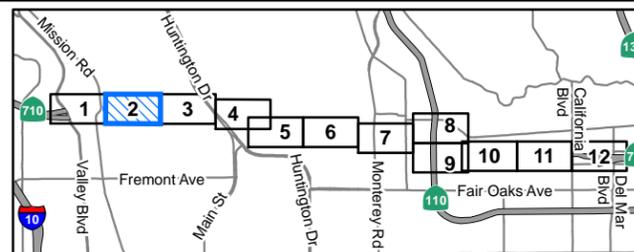


FIGURE 4-1
 Sheet 2 of 12

This page intentionally left blank



LEGEND

- | | | |
|--|--|---|
| Existing Land Use | Recreation | City Boundary |
| Residential | Institutional | |
| Commercial | Vacant | |
| Industrial | | |



SOURCE: CalTrans (2015); Bing Maps (2013)

I:\CDT1502\GIS\EXLU.mxd (12/2/2015)

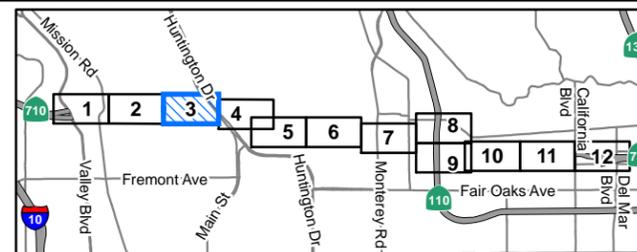


FIGURE 4-1
Sheet 3 of 12

This page intentionally left blank

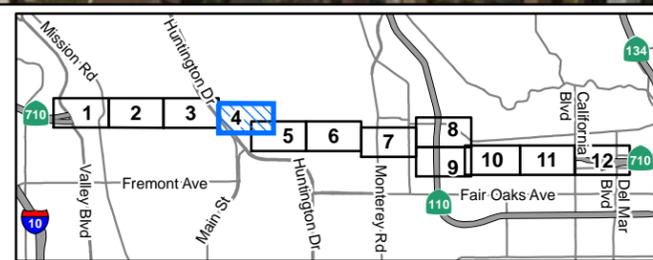
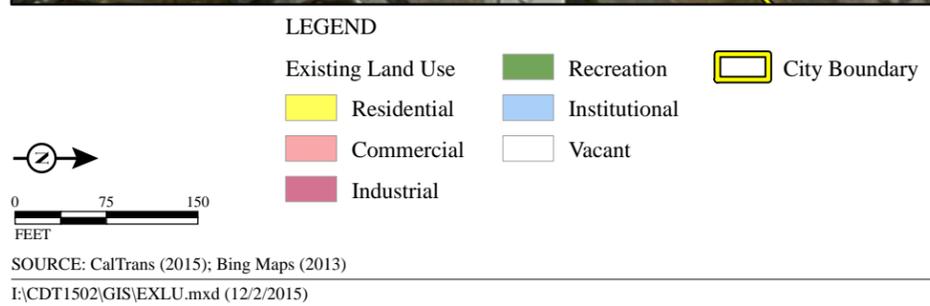


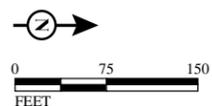
FIGURE 4-1
 Sheet 4 of 12

This page intentionally left blank



LEGEND

- | | | |
|-------------------|---------------|---------------|
| Existing Land Use | Recreation | City Boundary |
| Residential | Institutional | |
| Commercial | Vacant | |
| Industrial | | |



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\EXLU.mxd (12/2/2015)

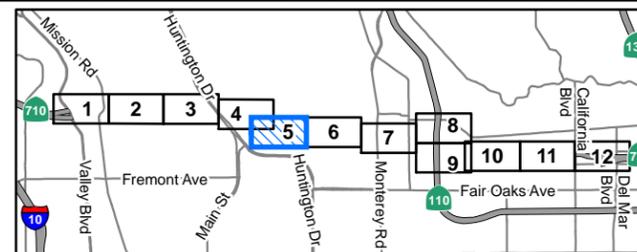
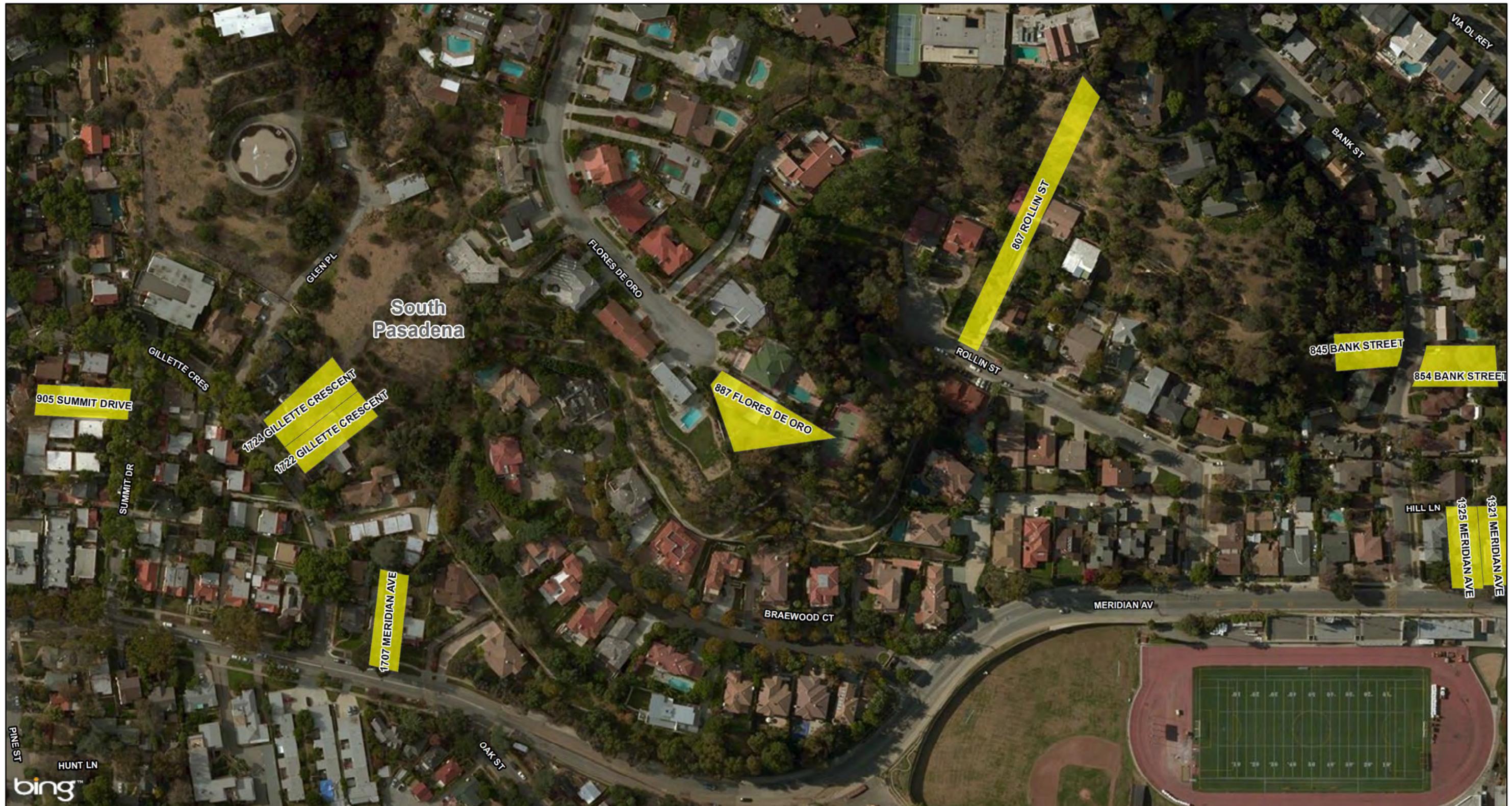


FIGURE 4-1
 Sheet 5 of 12

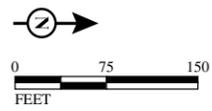
SR 710 Surplus Property Sale
 Existing Land Uses

This page intentionally left blank



LEGEND

- | | | |
|-------------------|---------------|---------------|
| Existing Land Use | Recreation | City Boundary |
| Residential | Institutional | |
| Commercial | Vacant | |
| Industrial | | |



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\EXLU.mxd (12/2/2015)

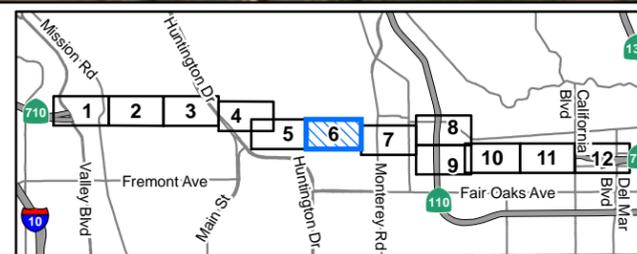
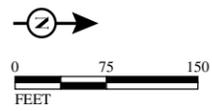
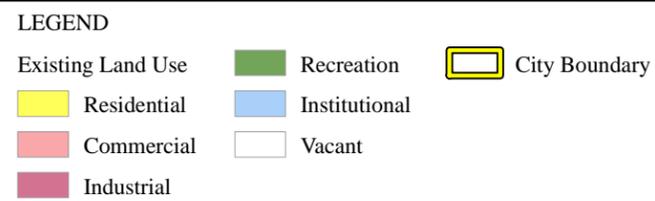


FIGURE 4-1
 Sheet 6 of 12

SR 710 Surplus Property Sale
 Existing Land Uses

This page intentionally left blank



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\EXLU.mxd (12/2/2015)

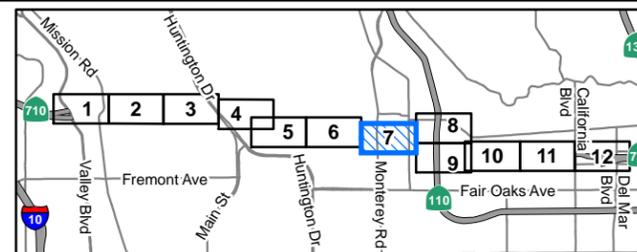
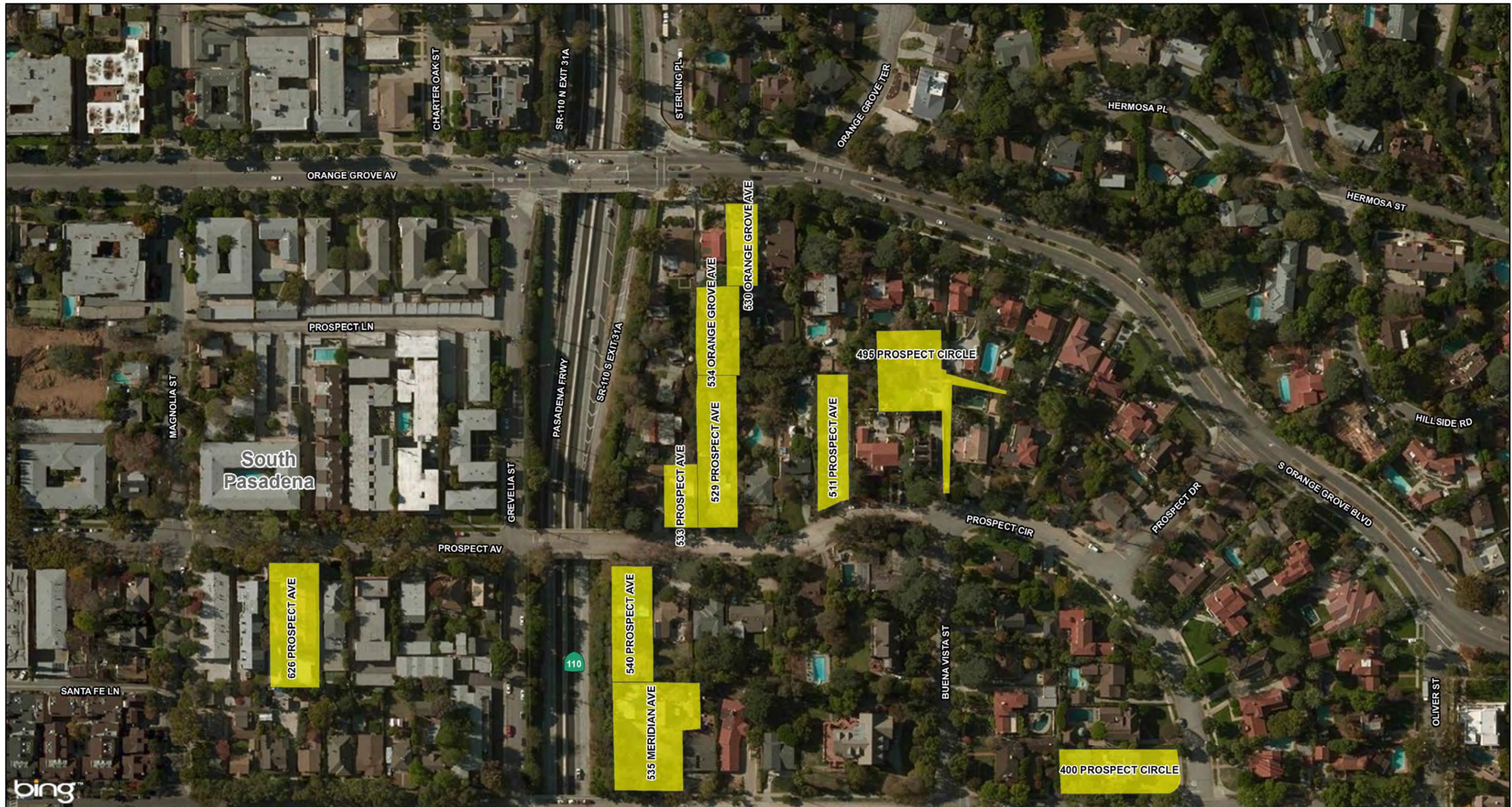


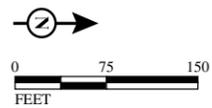
FIGURE 4-1
 Sheet 7 of 12

This page intentionally left blank



LEGEND

- | | | |
|--|--|---|
| Existing Land Use | Recreation | City Boundary |
| Residential | Institutional | |
| Commercial | Vacant | |
| Industrial | | |



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\EXLU.mxd (12/2/2015)

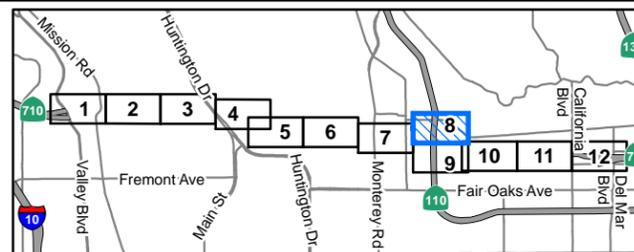
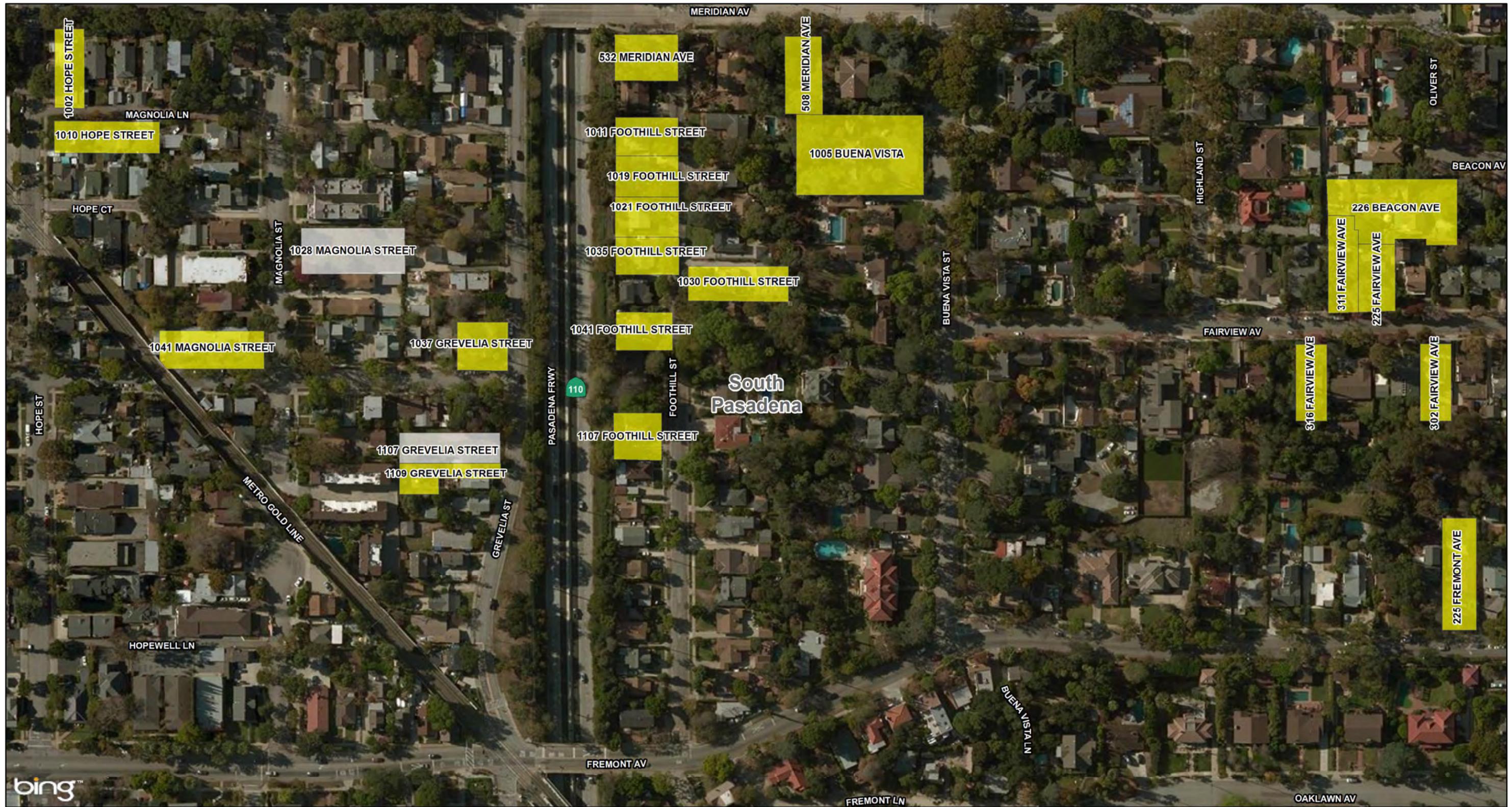


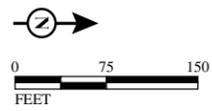
FIGURE 4-1
 Sheet 8 of 12

This page intentionally left blank



LEGEND

- | | | |
|-------------------|---------------|---------------|
| Existing Land Use | Recreation | City Boundary |
| Residential | Institutional | |
| Commercial | Vacant | |
| Industrial | | |



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\EXLU.mxd (12/2/2015)

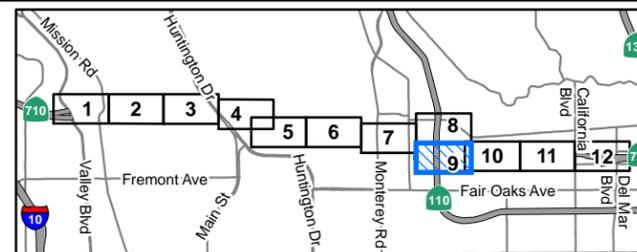
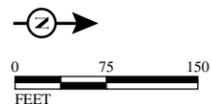
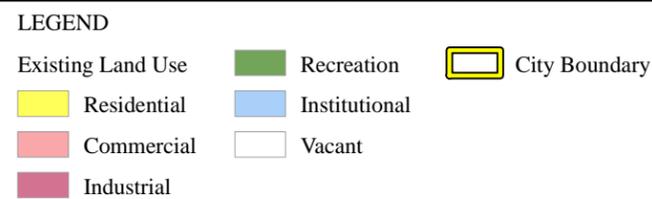


FIGURE 4-1
 Sheet 9 of 12

This page intentionally left blank



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\EXLU.mxd (12/2/2015)

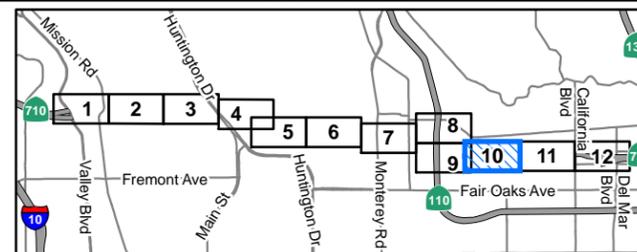
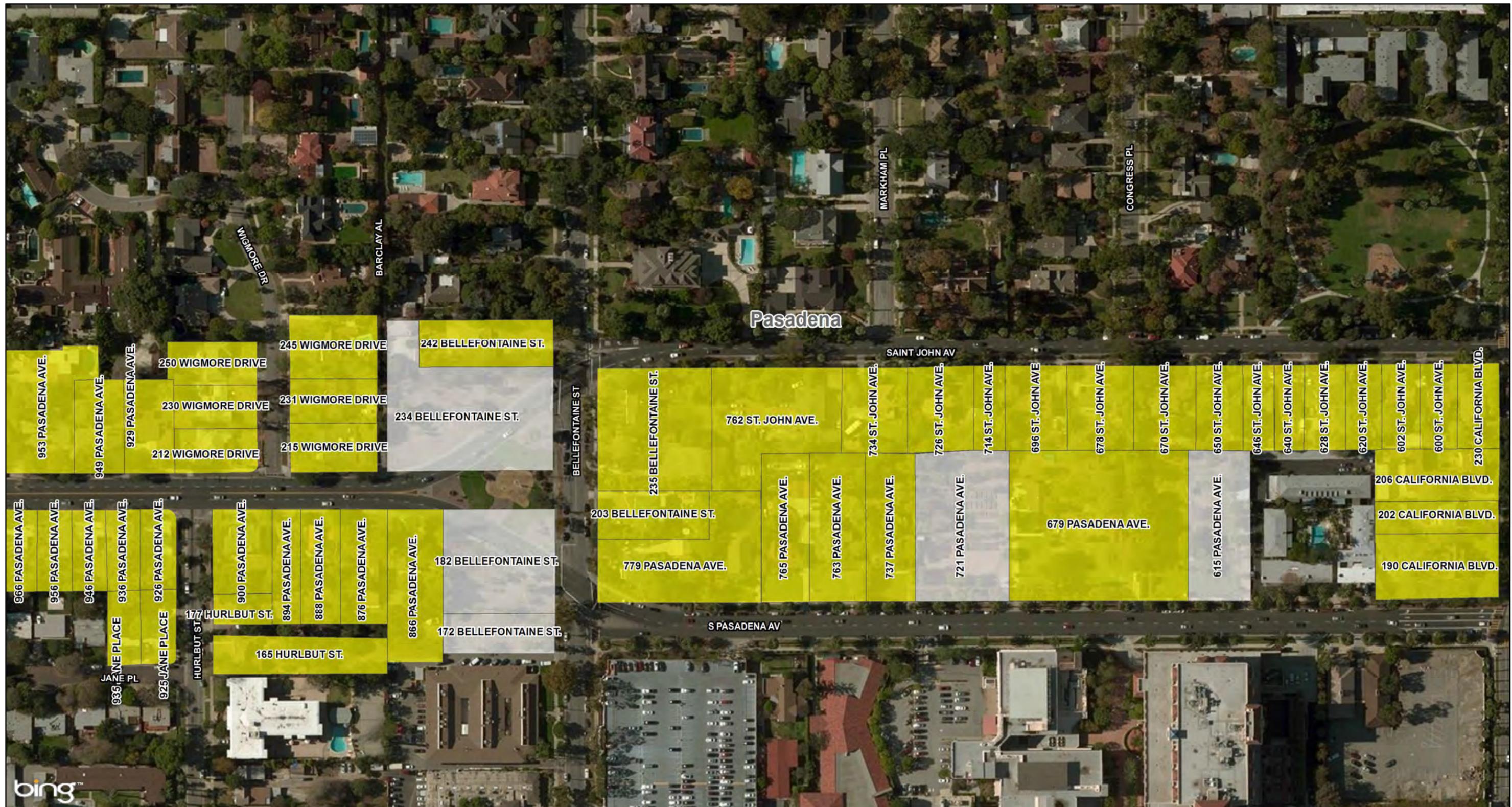
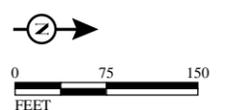


FIGURE 4-1
 Sheet 10 of 12

This page intentionally left blank



- LEGEND
- | | | |
|-------------------|---------------|---------------|
| Existing Land Use | Recreation | City Boundary |
| Residential | Institutional | |
| Commercial | Vacant | |
| Industrial | | |



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\EXLU.mxd (12/2/2015)

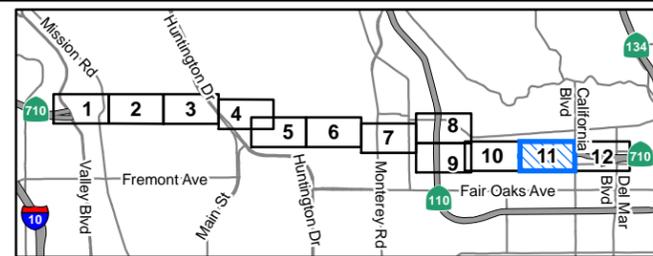
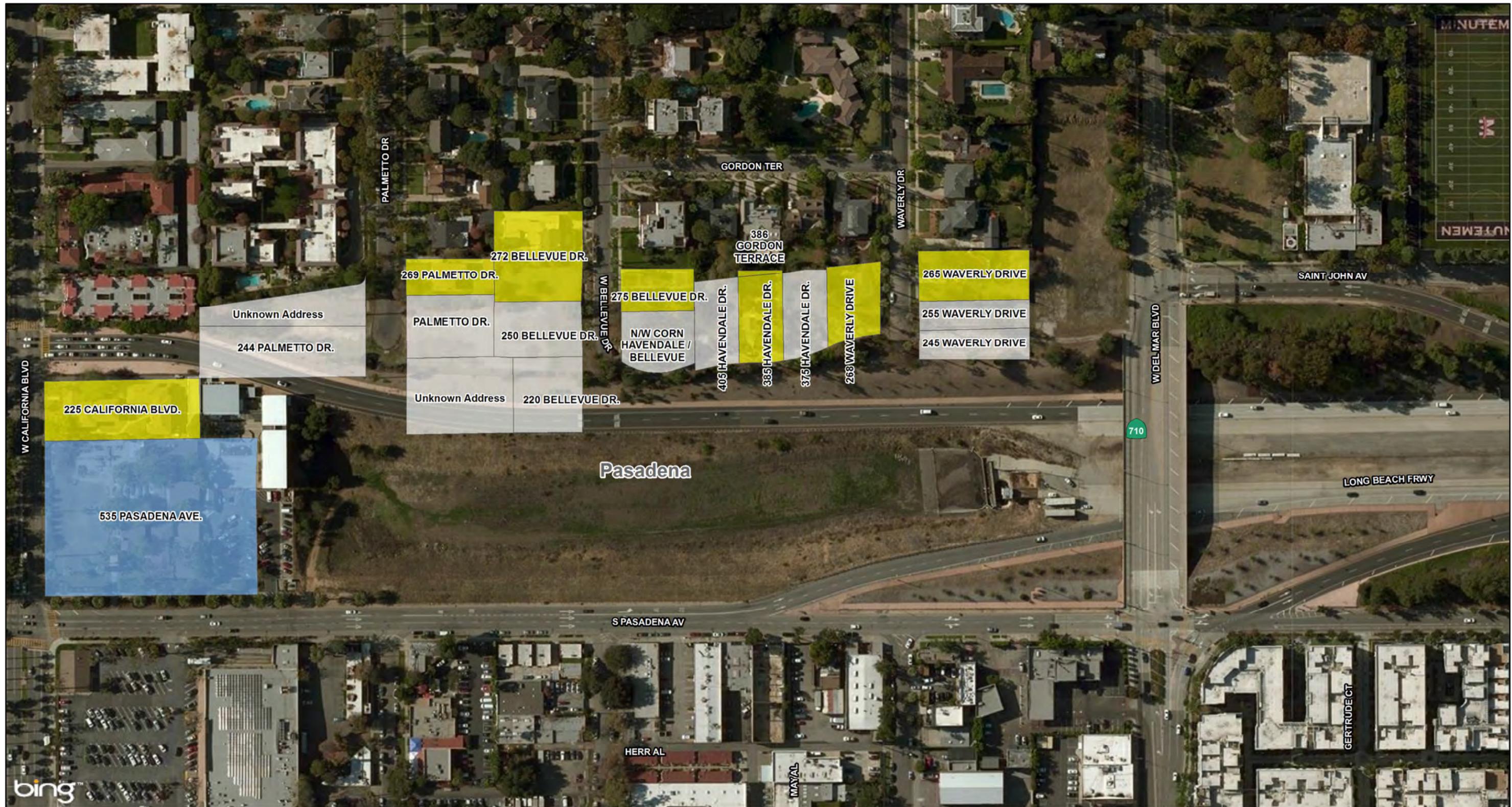


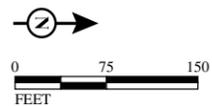
FIGURE 4-1
 Sheet 11 of 12

This page intentionally left blank



LEGEND

- | | | |
|--|---|--|
| Existing Land Use | ■ Recreation | City Boundary |
| Residential | Institutional | Vacant |
| Commercial | | |
| Industrial | | |



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\EXLU.mxd (12/2/2015)

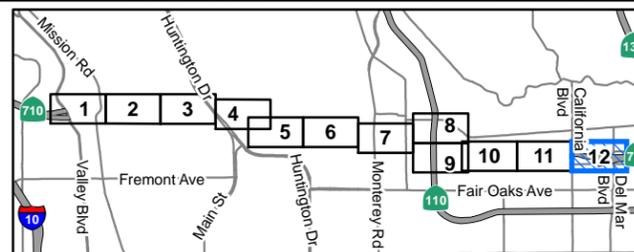


FIGURE 4-1
 Sheet 12 of 12

This page intentionally left blank

As indicated in Table 4.1, approximately 61 percent of the surplus properties in the neighborhood of El Sereno are currently developed for residential uses, while approximately 13 percent of the surplus properties within the neighborhood are currently vacant. Approximately 73 percent of the surplus properties in the City of Pasadena are currently developed for residential uses, while approximately 22 percent of the surplus properties within the City of Pasadena are currently vacant.

Approximately 91 percent of the surplus properties in the City of South Pasadena are currently developed for residential uses, while approximately 9 percent of the surplus properties within the City of South Pasadena are currently vacant.

4.1.1.2 Planned Land Uses

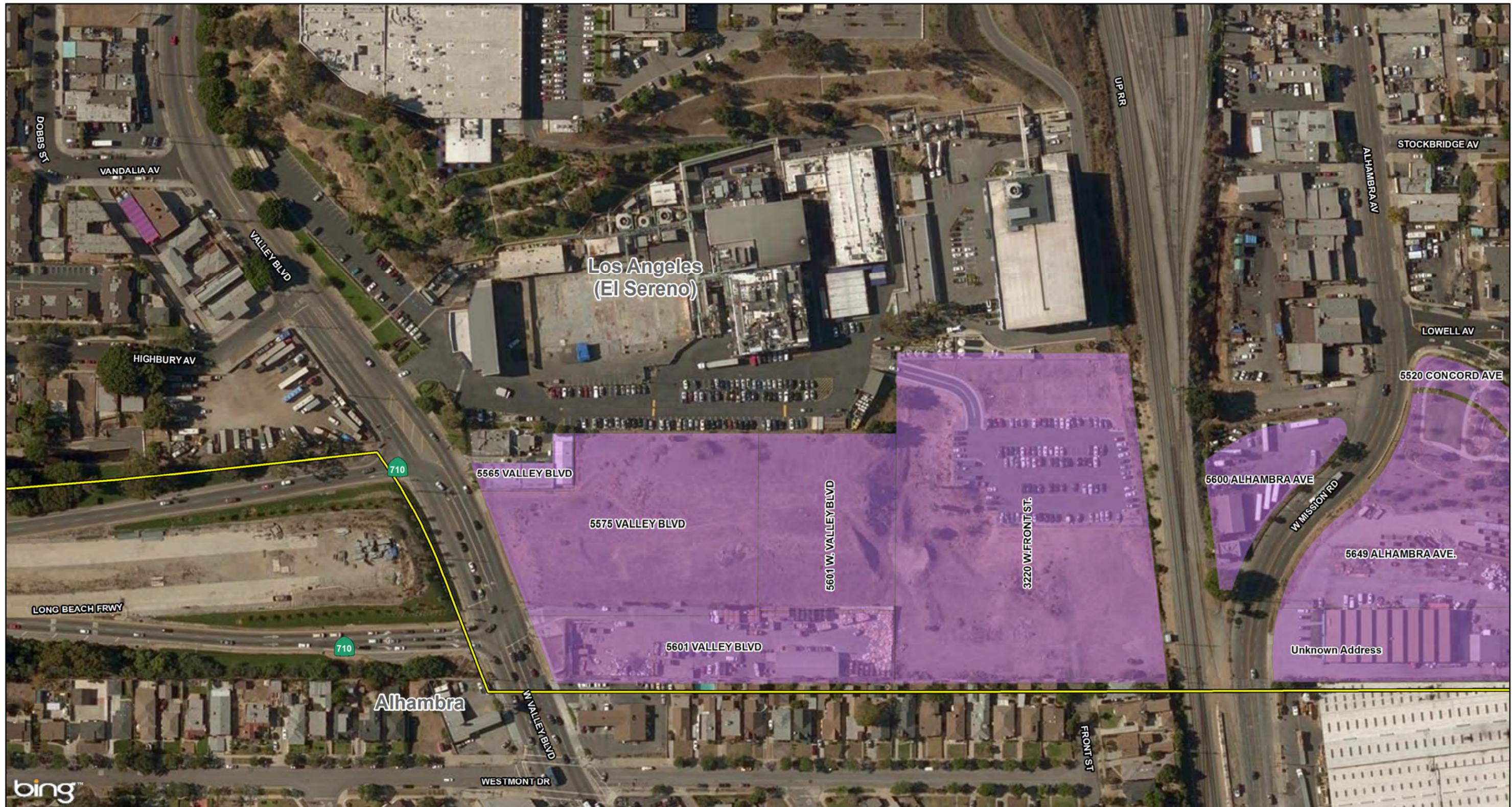
Figure 4-2 shows the General Plan land use designations by jurisdiction in the study area. The General Plan land uses in the study area include a wide range of residential, commercial and vacant uses. Because General Plan land uses reflect planned land use patterns within a jurisdiction's boundaries, they sometimes differ from the jurisdiction's existing land use patterns.

General Plan land use data are based on the General Plan Land Use map published by the City of Los Angeles and compiled into generalized land use designations. All of the 6.5 acres (ac) of vacant surplus properties in El Sereno are designated for public facility uses.

General Plan land use data are based on the General Plan Land Use map published by the City of Pasadena and compiled into generalized land use designations. Of the 9.3 ac of vacant surplus properties in Pasadena, approximately 5.7 ac are designated for low-density residential uses. The Pasadena General Plan Land Use Element does not designate any land uses on the remaining approximately 3.6 ac of vacant surplus properties.

General Plan land use data is based on the General Plan Land Use map published by the City of South Pasadena and compiled into generalized land use designations. Of the 1.5 ac of vacant surplus properties in South Pasadena, approximately 1 ac is designated for low-density residential uses and 0.5 ac is designated for medium-density residential uses.

This page intentionally left blank



LEGEND

General Plan Land Use

- Low Density Residential
- Low Medium Density Residential
- Medium Density Residential
- High Density Residential

- Institutional
- Open Space
- Public Facilities
- No Land Use Designation

City Boundary

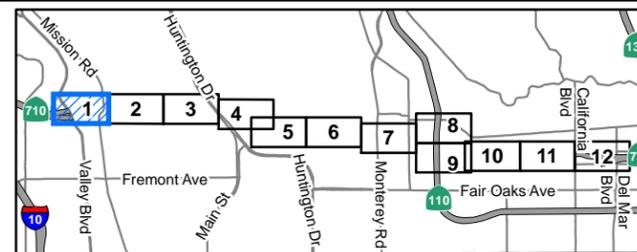
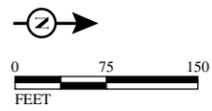
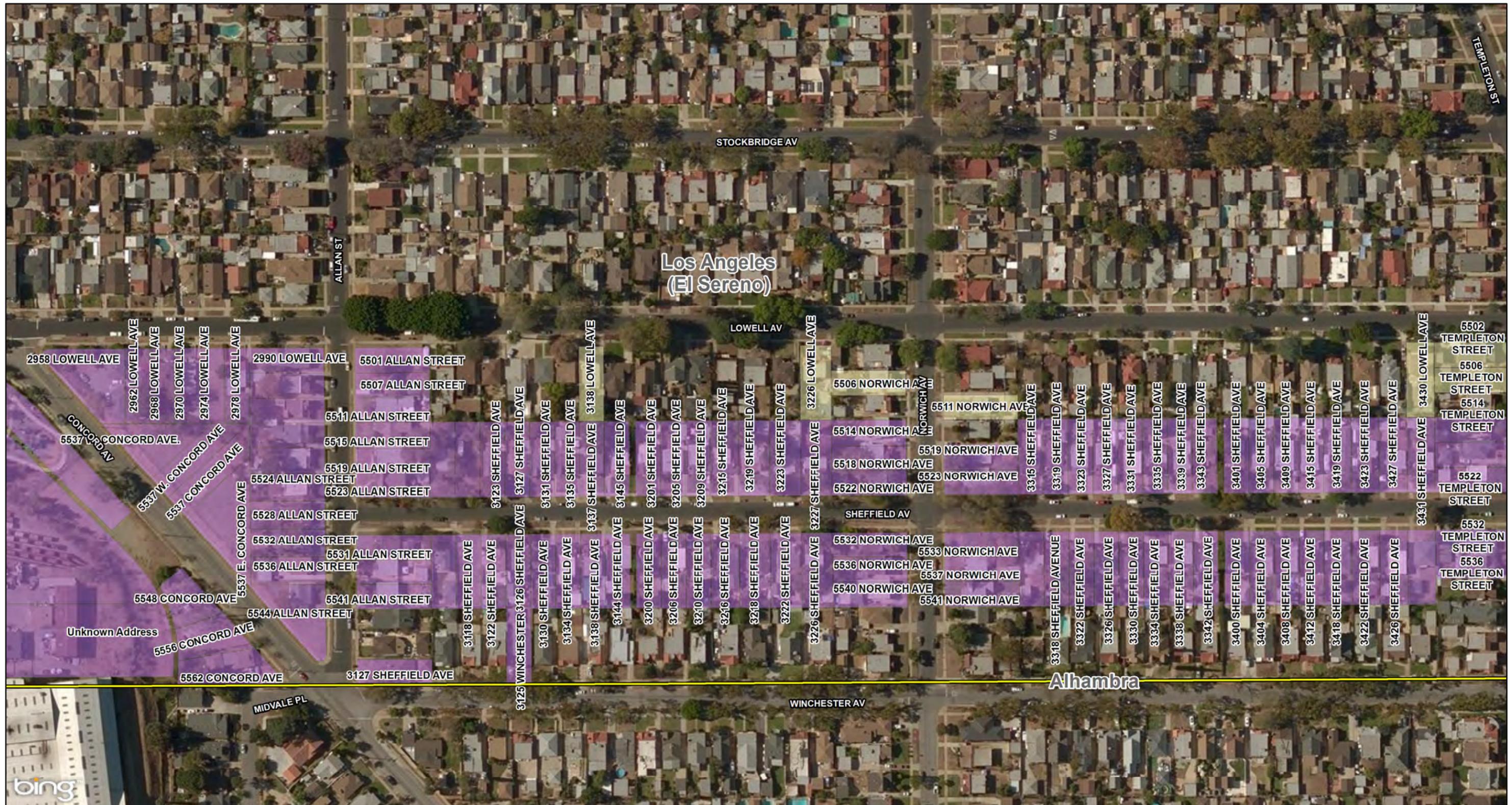


FIGURE 4-2
Sheet 1 of 12

SR 710 Surplus Property Sale
General Plan Land Uses

This page intentionally left blank



LEGEND

General Plan Land Use

- | | | |
|--|---|---|
|  Low Density Residential |  Institutional |  City Boundary |
|  Low Medium Density Residential |  Open Space | |
|  Medium Density Residential |  Public Facilities | |
|  High Density Residential |  No Land Use Designation | |

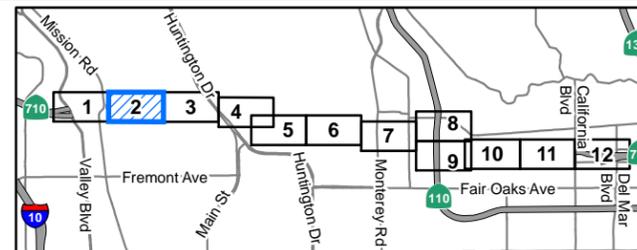
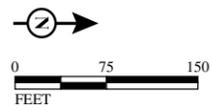


FIGURE 4-2
Sheet 2 of 12

This page intentionally left blank



LEGEND

General Plan Land Use

- Low Density Residential
- Low Medium Density Residential
- Medium Density Residential
- High Density Residential
- Institutional
- Open Space
- Public Facilities
- No Land Use Designation

City Boundary

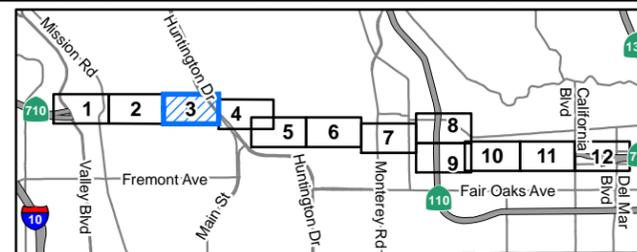
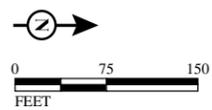


FIGURE 4-2
Sheet 3 of 12

SR 710 Surplus Property Sale
General Plan Land Uses

SOURCE: CalTrans (2015); Bing Maps (2013); City of Pasadena (2009); City of Los Angeles (2014); City of South Pasadena (1998)
I:\CDT\1502\GIS\GPLU.mxd (12/2/2015)

This page intentionally left blank



LEGEND

General Plan Land Use

- Low Density Residential
- Low Medium Density Residential
- Medium Density Residential
- High Density Residential
- Institutional
- Open Space
- Public Facilities
- No Land Use Designation

City Boundary

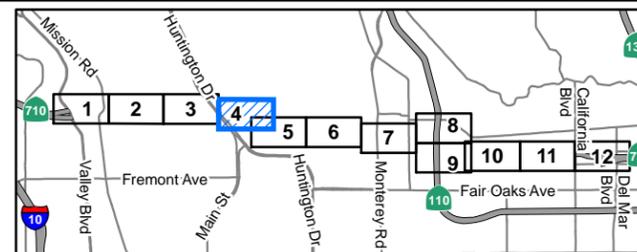
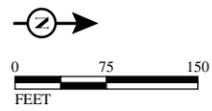
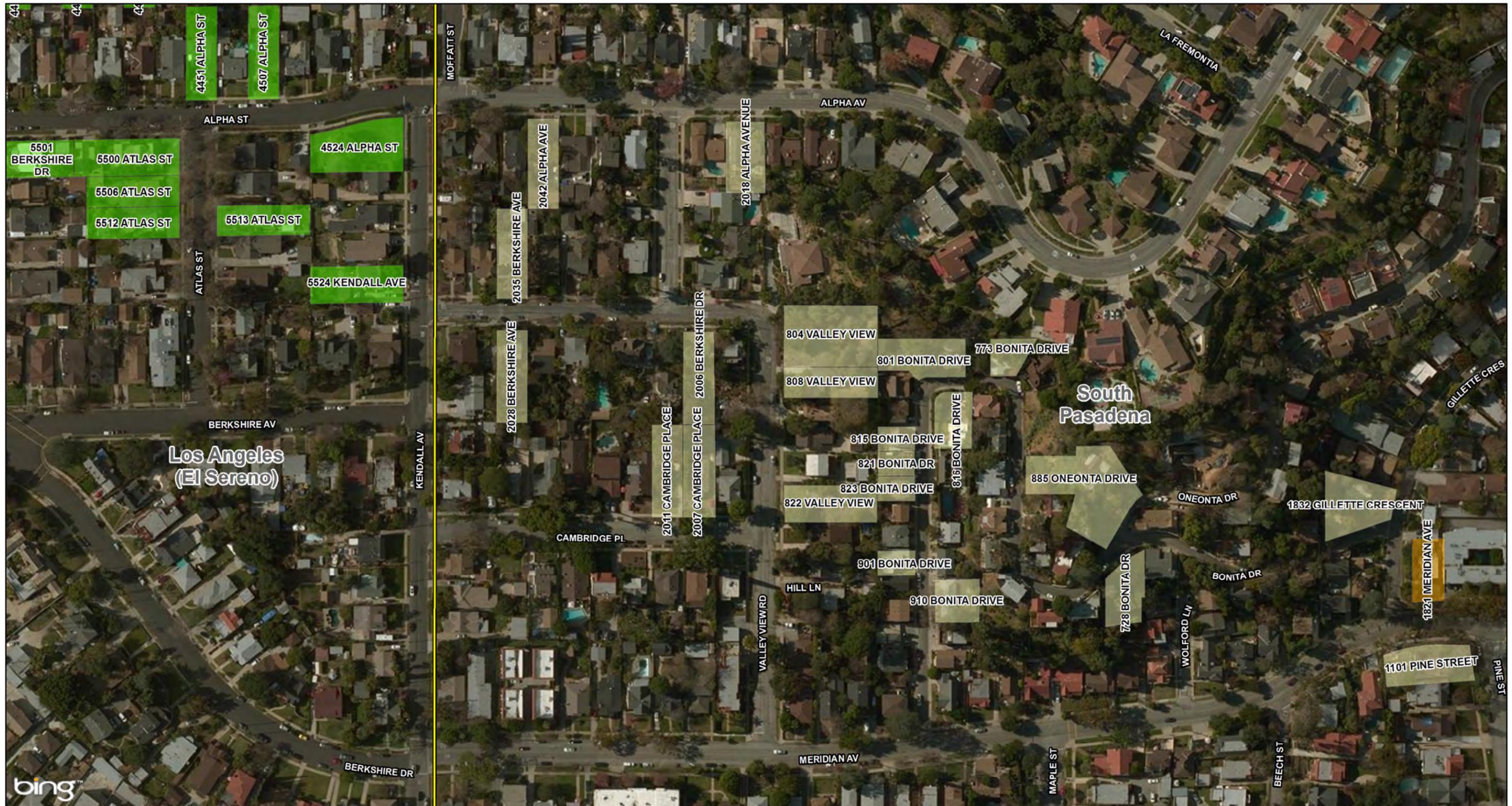


FIGURE 4-2
Sheet 4 of 12

SOURCE: CalTrans (2015); Bing Maps (2013); City of Pasadena (2009); City of Los Angeles (2014); City of South Pasadena (1998)
I:\CDT1502\GIS\GPLU.mxd (12/2/2015)

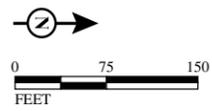
This page intentionally left blank



LEGEND

General Plan Land Use

- | | | |
|--|---|---|
|  Low Density Residential |  Institutional |  City Boundary |
|  Low Medium Density Residential |  Open Space | |
|  Medium Density Residential |  Public Facilities | |
|  High Density Residential |  No Land Use Designation | |



SOURCE: CalTrans (2015); Bing Maps (2013); City of Pasadena (2009); City of Los Angeles (2014); City of South Pasadena (1998)

I:\CDT1502\GIS\GPLU.mxd (12/2/2015)

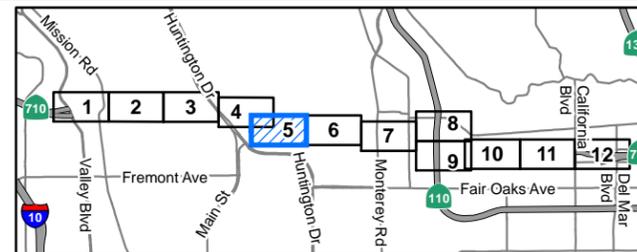


FIGURE 4-2
Sheet 5 of 12

SR 710 Surplus Property Sale
General Plan Land Uses

This page intentionally left blank



LEGEND

General Plan Land Use

- | | | |
|--------------------------------|-------------------------|---------------|
| Low Density Residential | Institutional | City Boundary |
| Low Medium Density Residential | Open Space | |
| Medium Density Residential | Public Facilities | |
| High Density Residential | No Land Use Designation | |

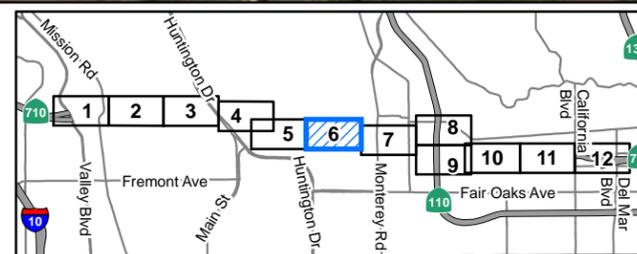
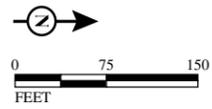
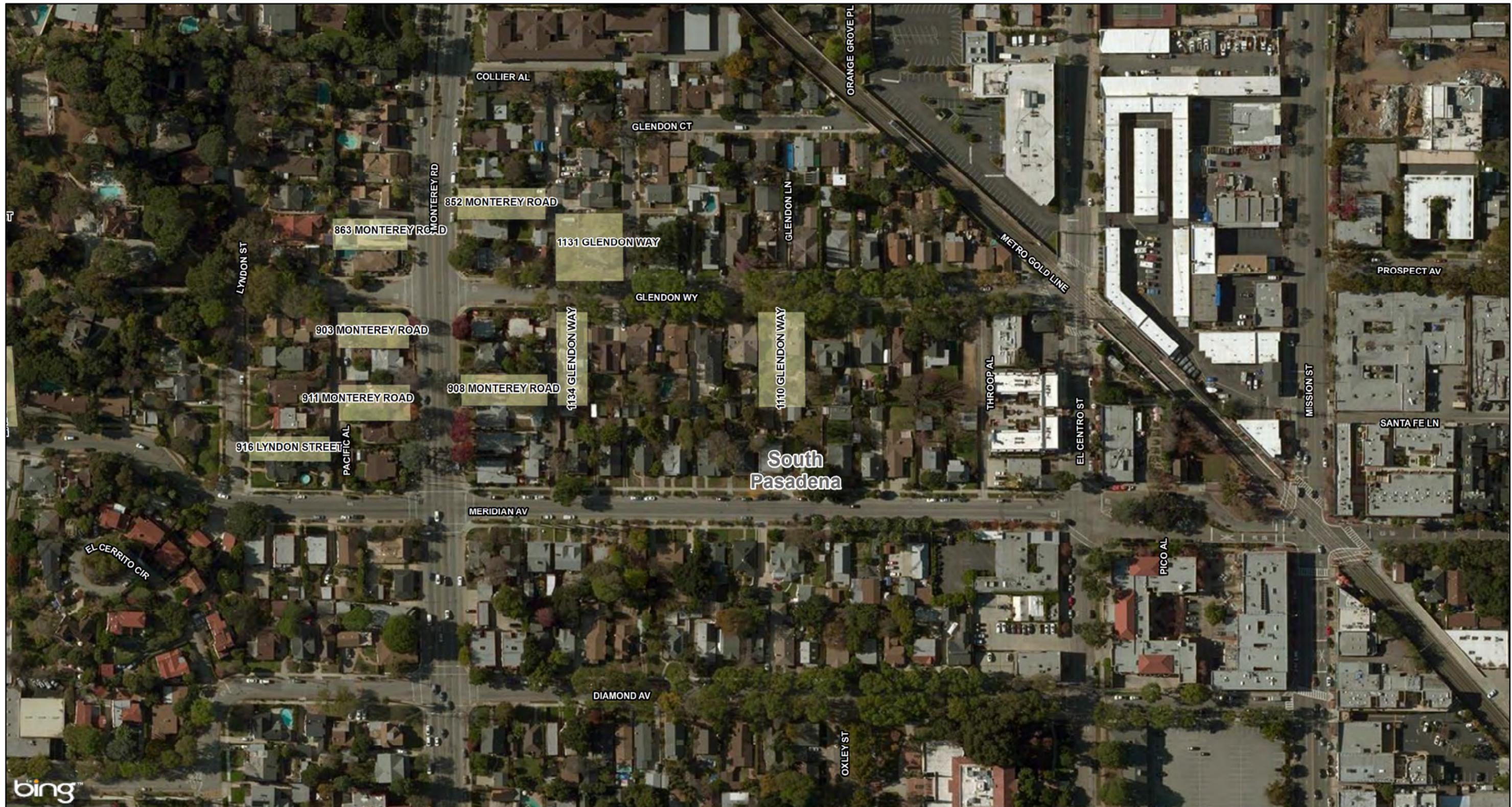


FIGURE 4-2
Sheet 6 of 12

SR 710 Surplus Property Sale
General Plan Land Uses

This page intentionally left blank



LEGEND

General Plan Land Use

- Low Density Residential
- Low Medium Density Residential
- Medium Density Residential
- High Density Residential

- Institutional
- Open Space
- Public Facilities
- No Land Use Designation

City Boundary

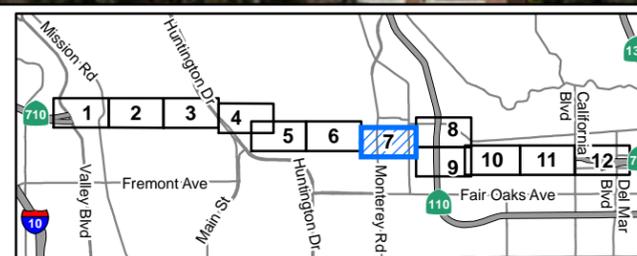
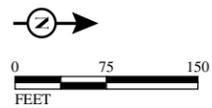
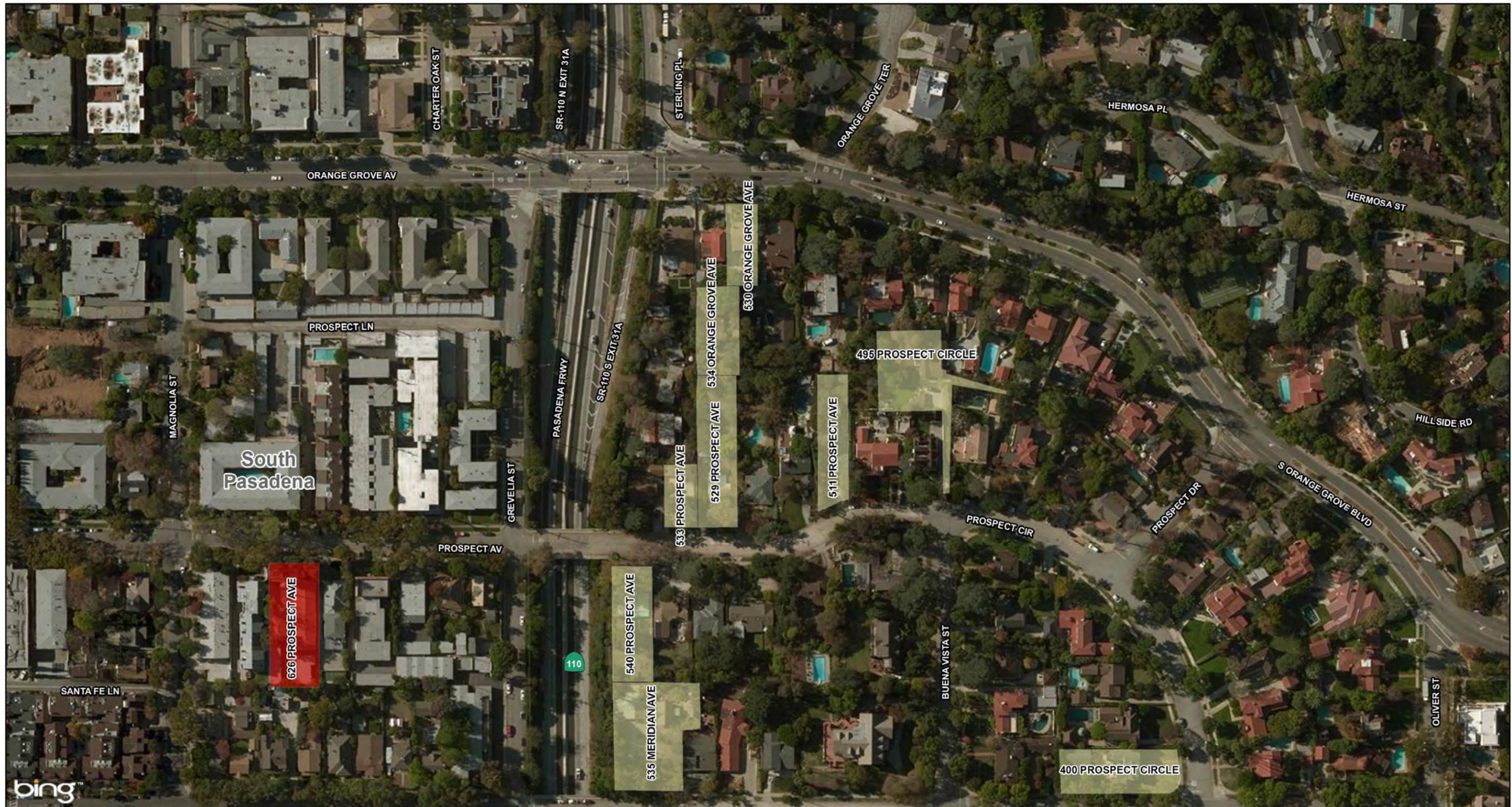


FIGURE 4-2
Sheet 7 of 12

SR 710 Surplus Property Sale
General Plan Land Uses

This page intentionally left blank



LEGEND

General Plan Land Use

- Low Density Residential
- Low Medium Density Residential
- Medium Density Residential
- High Density Residential
- Institutional
- Open Space
- Public Facilities
- No Land Use Designation

City Boundary

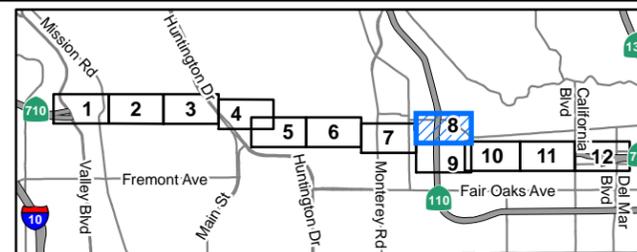
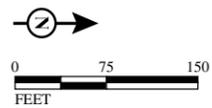
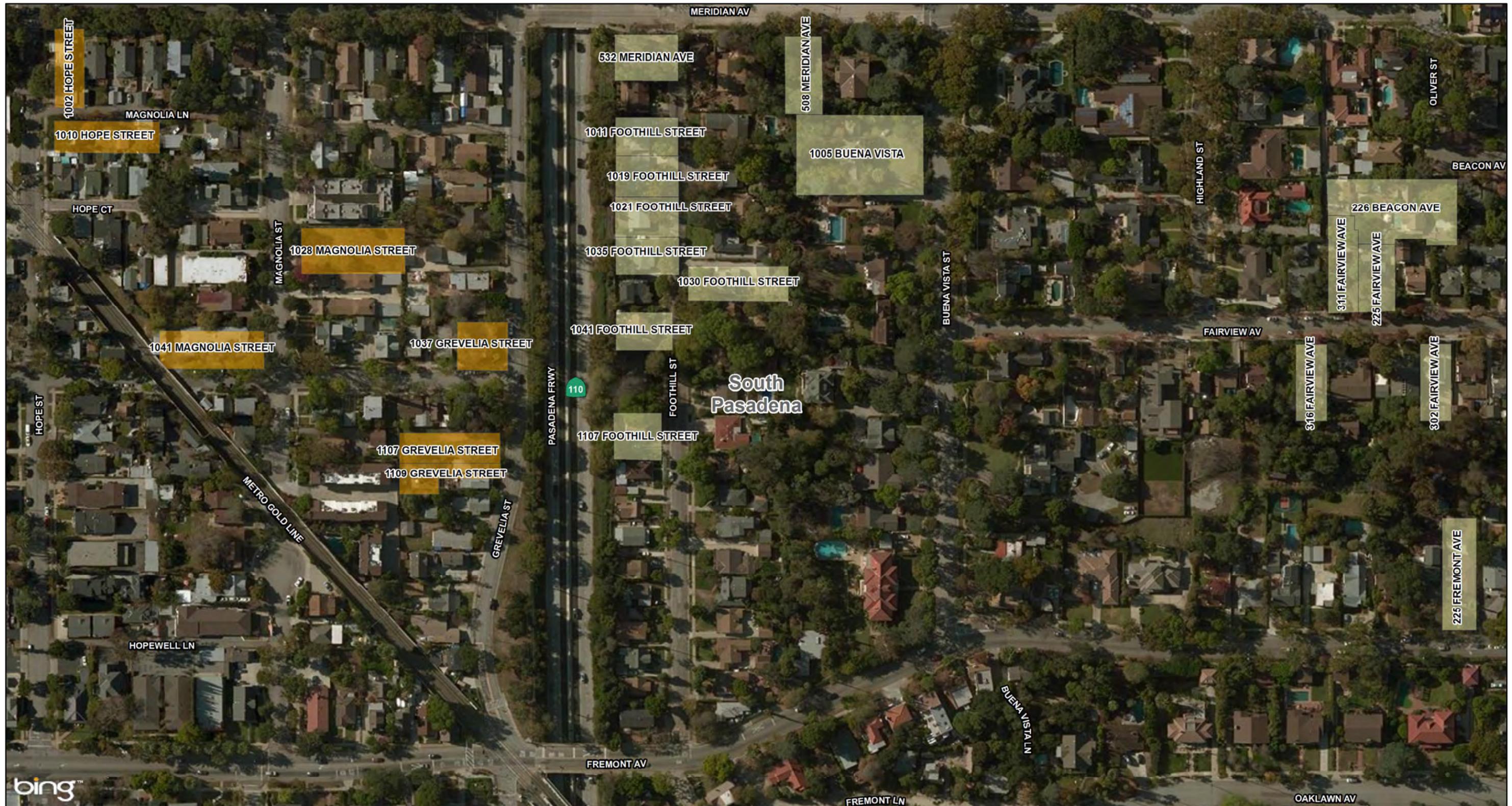


FIGURE 4-2
Sheet 8 of 12

SR 710 Surplus Property Sale
General Plan Land Uses

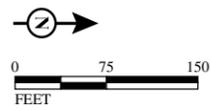
This page intentionally left blank



LEGEND

General Plan Land Use

- | | | |
|--|---|---|
|  Low Density Residential |  Institutional |  City Boundary |
|  Low Medium Density Residential |  Open Space | |
|  Medium Density Residential |  Public Facilities | |
|  High Density Residential |  No Land Use Designation | |



SOURCE: CalTrans (2015); Bing Maps (2013); City of Pasadena (2009); City of Los Angeles (2014); City of South Pasadena (1998)

I:\CDT1502\GIS\GPLU.mxd (12/2/2015)

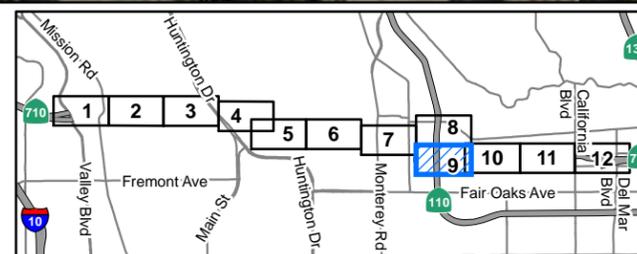
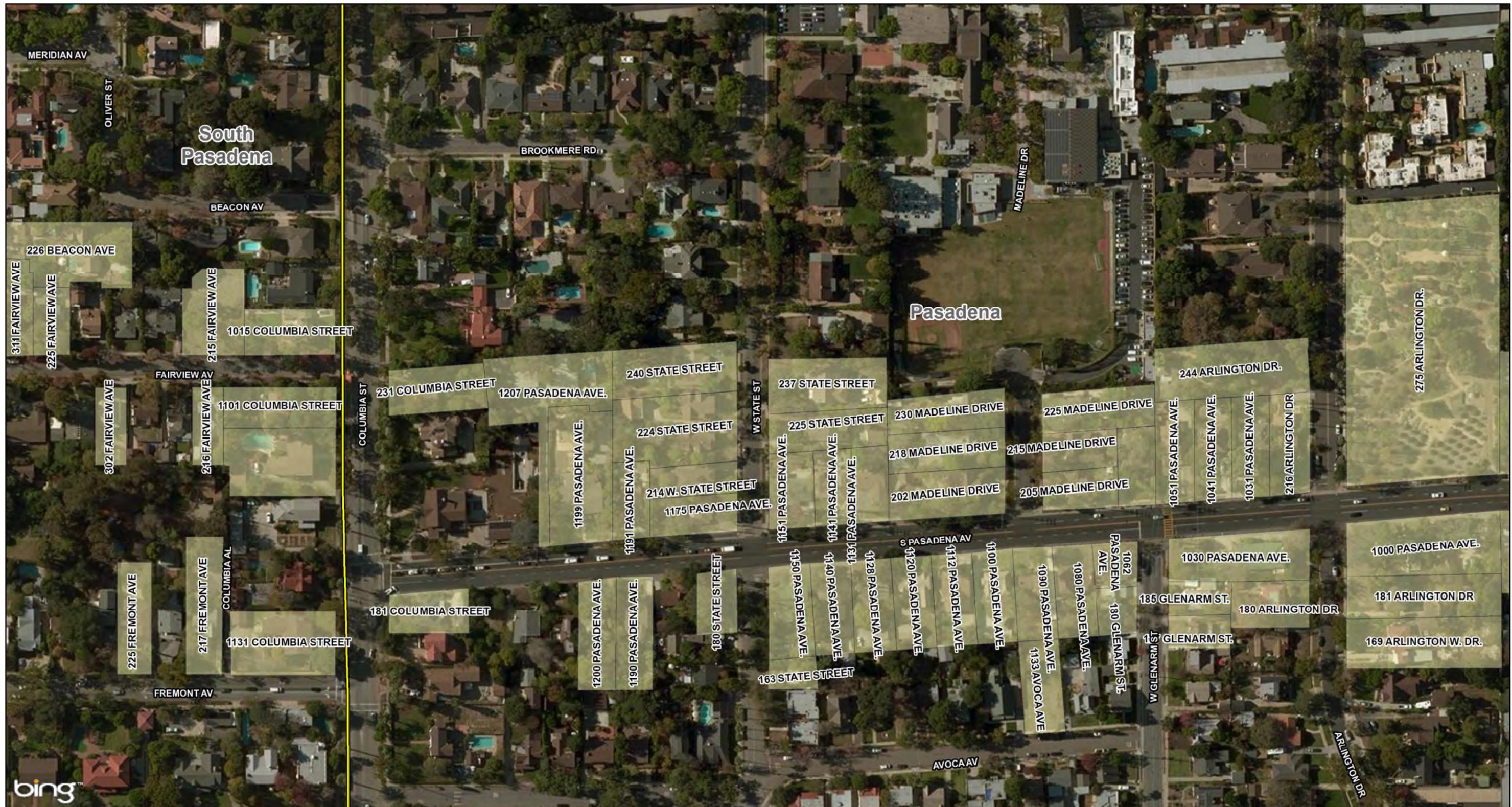


FIGURE 4-2
Sheet 9 of 12

SR 710 Surplus Property Sale
General Plan Land Uses

This page intentionally left blank



LEGEND

General Plan Land Use

- Low Density Residential
- Low Medium Density Residential
- Medium Density Residential
- High Density Residential

- Institutional
- Open Space
- Public Facilities
- No Land Use Designation

City Boundary

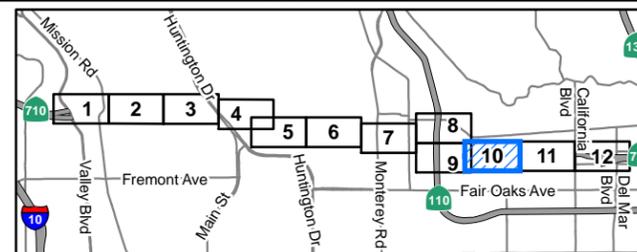
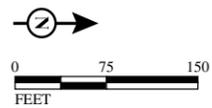
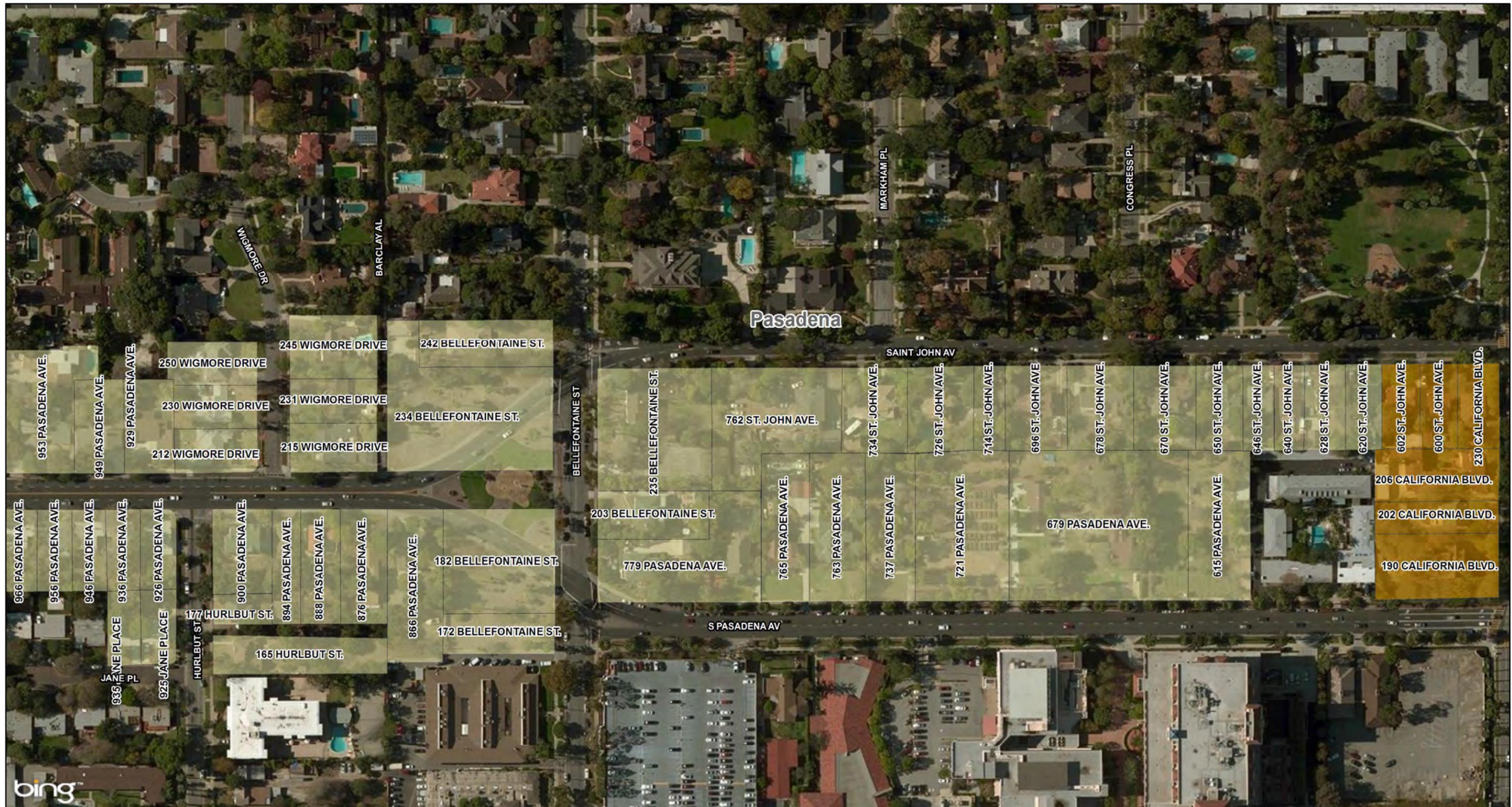


FIGURE 4-2
Sheet 10 of 12

This page intentionally left blank



LEGEND

General Plan Land Use

- | | | | |
|---|--------------------------------|---|-------------------------|
|  | Low Density Residential |  | Institutional |
|  | Low Medium Density Residential |  | Open Space |
|  | Medium Density Residential |  | Public Facilities |
|  | High Density Residential |  | No Land Use Designation |

 City Boundary

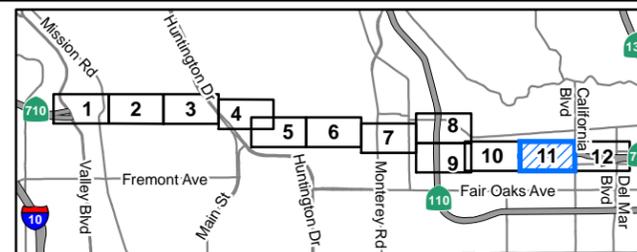
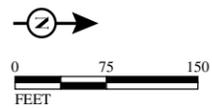


FIGURE 4-2
Sheet 11 of 12

SR 710 Surplus Property Sale
General Plan Land Uses

This page intentionally left blank

This page intentionally left blank

4.1.1.3 Development Trends

Planned and approved land development projects in the study area are further discussed in Section 5.2, Cumulative Impacts. Section 4.2.3, Growth, provides a discussion of forecasted growth in Los Angeles County (County) and the cities in the study area. The cities and communities in the study area have been forecast to experience various rates of growth in population, households, and employment between 2008 and 2035. In general, the study area includes cities and communities that are largely built out and do not contain much developable open space.

4.1.2 Regulatory Requirements

4.1.2.1 Adopted Plans

Adopted plans that guide development within the study area include the General Plans of the Cities of Los Angeles, Pasadena, and South Pasadena, as well as various community and specific plans.

A Northeast Los Angeles Community Plan, adopted separately from the General Plan elements, was also approved to identify specific actions the City of Los Angeles will undertake to implement goals and policies contained in its General Plan. A Mission Street Specific Plan was adopted by the City of South Pasadena City Council in 1996 to address the impacts of the Gold Line on Mission Street and implement its vision of Mission Street as South Pasadena's pedestrian-oriented, historic shopping street.

General and Community Plans

The Northeast Los Angeles Community Plan and the City of Los Angeles General Plan do not contain any goals or policies relevant to the proposed action.

The following excerpted objectives and policies from the City of Pasadena General Plan are relevant to the proposed action:

- **City of Pasadena General Plan, Housing Element (2014)**
 - **Maintain Clearinghouse of Sites:** Maintain clearinghouse of potential residential sites. These would include: City-owned and State Property such as Caltrans and PUSD (Pasadena Unified School District) surplus properties
 - **Buy Covenants on Caltrans Homes:** Evaluate the potential of the City purchasing affordability covenants on Caltrans-owned single-family homes sitting vacant along the 710 Corridor.

The following excerpted goals and policies from the City of South Pasadena General Plan are relevant to the proposed action:

- **City of South Pasadena General Plan, Land Use and Community Design Element (1998)**
 - Goal 11-Housing Balance
 - **Policy 11.5: Reclaim Excess Right-of-Way Properties.**
Seek City’s exclusive right-to-negotiate with Caltrans on excess Route 710 right-of-way for purposes of providing ownership of affordable housing or open space amenities.
- **City of South Pasadena General Plan, Housing Element (2014)**
 - **Policy 6.6.2.2: Assisting in the Provision of Housing: Housing Acquisition and Rehabilitation:** A number of surplus housing units resulted from the change in the proposed route of the extension of the 710 Freeway. The City monitors the status of these properties in order to identify any properties deemed surplus by Caltrans and monitors opportunities for their acquisition and rehabilitation by non-profit developers as affordable housing.

The Mission Street Specific Plan was adopted by the City of South Pasadena City Council in 1996 to address the impacts of the Gold Line on Mission Street and implement its vision of Mission Street as South Pasadena’s pedestrian-oriented, historic shopping street. The Mission Street Specific Plan area is divided into the Core Area (between Fremont Avenue and Prospect Avenue and within easy walking distance of the Gold Line station) and the West Area (west of Prospect Avenue). The Mission Street Specific Plan identifies the following guideline regarding the surplus properties within the Specific Plan’s planning area that are owned by the California Department of Transportation (Caltrans):

Guideline 1.9: Infill Residential. Seek opportunities to acquire, rehabilitate, and/or redevelop Caltrans-owned properties for creating affordable housing.

4.1.3 Significance Criteria

Criteria for determining the significance of land use impacts are based on the California Environmental Quality Act (CEQA) Guidelines, Appendix G –

Environmental Checklist. Land use impacts would be considered significant if they were to:

- **LU-A:** Physically divide an established community.
- **LU-B:** Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.
- **LU-C:** Conflict with any applicable habitat conservation plan or natural community conservation plan.

4.1.4 Impacts

4.1.4.1 Alternative 1 – No Action (No Sale) Alternative

Impacts LU-A and LU-C would not occur under implementation of Alternative 1.

Alternative 1 would result in inconsistencies with land use designations in General Plans for local jurisdictions. Under Alternative 1, those inconsistencies would exist until the applicable local General Plans are amended to reflect the use of the affected parcels. Caltrans does not have land use planning authority and has no authority to require local jurisdictions to amend their General Plans. Therefore, it will be the decision of the affected local jurisdictions on how and when to address the identified General Plan land use inconsistencies. However, because it is generally desirable that General Plans be consistent with existing conditions, Caltrans will request that the applicable local jurisdictions amend their General Plans, as specified in Measure LU-1. However, because Caltrans has no authority to require a General Plan amendment, a significant unavoidable impact would remain until the General Plans are amended.

Table 4.2 summarizes plan inconsistencies for Alternative 1.

4.1.4.2 Alternative 2 – Action Alternative

All variations of Alternative 2 would result in the sale of the surplus properties; however, the transfer of ownership title from Caltrans to a different owner is not expected to alter or otherwise affect the existing land uses on the surplus properties or existing land use patterns in the areas surrounding the surplus properties. All variations would be consistent with specific individual policies in the General Plans of the Cities of Pasadena and South Pasadena as well as in the City of South Pasadena

Table 4.2 Plan Consistency Analysis for Alternative 1

Policy	Consistent?
CITY OF PASADENA LAND USE PLAN CONSISTENCY ANALYSIS	
City of Pasadena General Plan	
<i>Housing Element</i>	
Maintain Clearinghouse of Sites. Maintain clearinghouse of potential residential sites. These would include: City-owned and State property such as Caltrans PUSD surplus properties.	Inconsistent. Because Caltrans would retain ownership of the surplus properties indefinitely under Alternative 1, the City of Pasadena would be unable to include the surplus properties on its list of potential residential sites. Therefore, Alternative 1 would be inconsistent with this policy.
Buy Covenants on Caltrans Homes. Evaluate the potential of the City purchasing affordability covenants on Caltrans-owned single-family homes sitting vacant along the 710 Corridor.	Inconsistent. Because Caltrans would retain ownership of the surplus properties indefinitely under Alternative 1, the City of Pasadena would be unable to purchase affordability covenants on any of the vacant residential surplus properties. Therefore, Alternative 1 would be inconsistent with this policy.
CITY OF SOUTH PASADENA LAND USE PLAN CONSISTENCY ANALYSIS	
City of South Pasadena General Plan	
<i>Land Use & Community Design Element</i>	
Housing Balance Goal 11, Policy 11.5: Reclaim Excess Right-of-Way Properties. Seek City's exclusive right-to-negotiate with Caltrans on excess Route 710 right-of-way for purposes of providing ownership of affordable housing or open space amenities.	Inconsistent. Because Caltrans would retain ownership of the surplus properties indefinitely under Alternative 1, the City of South Pasadena would be unable to negotiate with Caltrans regarding the purchase of the surplus properties for the purpose of providing affordable housing or open space amenities. Therefore, Alternative 1 would be inconsistent with Goal 11, Policy 11.5.
<i>Housing Element</i>	
Policy 6.6.2.2: Assisting in the Provision of Housing: Housing Acquisition and Rehabilitation – Eight-Year Objective. The City's objective is to continue to monitor surplus Caltrans properties in the 710 surface route corridor and provide technical assistance where feasible to non-profit affordable housing developers pursuing acquisition and rehabilitation of any Caltrans declared surplus properties in the 710 surface route corridor as affordable housing.	Inconsistent. Because Caltrans would retain ownership of the surplus properties indefinitely, Alternative 1 would preclude nonprofit affordable housing developers from pursuing acquisition and rehabilitation of the Caltrans-owned surplus properties as affordable housing units. Therefore, Alternative 1 would be inconsistent with Policy 6.6.2.2.
City of South Pasadena Mission Street Specific Plan	
<i>Land Use & Community Design Element</i>	
Guideline 1.9: Infill Residential. Seek opportunities to acquire, rehabilitate, and/or redevelop Caltrans-owned properties for creating affordable housing.	Inconsistent. Under Alternative 1, the surplus properties would remain under Caltrans ownership indefinitely and would not be made available for sale to create affordable housing opportunities. Therefore, Alternative 1 would be inconsistent with Guideline 1.9.

Source: *Community Impact Assessment* (LSA 2015).
 Caltrans = California Department of Transportation
 PUSD = Pasadena Unified School District

Mission Street Specific Plan that support the sale of the surplus properties for affordable housing and other purposes. Table 4.3 summarizes plan consistency for Alternative 2.

Variation A – Sale Over 5-Year Period

Under Variation A Option 1, subsurface rights to a tunnel easement would be retained. Under Variation A Option 2, all subsurface property rights would be conveyed with the properties. Variation A Options 1 and 2 would not modify any of the land use plans or zoning ordinances that control land use decisions and development patterns on or surrounding the surplus properties. Any future development on the surplus properties sold by Caltrans would be undertaken in accordance with the applicable General Plan land use and zoning designations in effect at the time such development is proposed. Any proposed changes to the General Plan or zoning designations applicable to the surplus properties would be subject to a separate environmental review process undertaken by the city in which the affected properties are located.

Variation B – Immediate Sale

Under Variation B Option 1, subsurface rights to a tunnel easement would be retained. Under Variation B Option 2, all subsurface property rights would be conveyed with the properties. Variation B Options 1 and 2 would not modify any of the land use plans or zoning ordinances that control land use decisions and development patterns on or surrounding the surplus properties. Any future development on the surplus properties sold by Caltrans would be undertaken in accordance with the applicable General Plan land use and zoning designations in effect at the time such development is proposed. Any proposed changes to the General Plan or zoning designations applicable to the surplus properties would be subject to a separate environmental review process undertaken by the city in which the affected properties are located.

4.1.5 Avoidance, Minimization, and/or Mitigation Measures

4.1.5.1 Alternative 1 – No Action (No Sale) Alternative

Under Alternative 1, inconsistencies would exist until the Pasadena and South Pasadena General Plans and the Mission Street Specific Plan are amended to reflect that the surplus properties will not be sold. However, because it is generally desirable that local planning documents be consistent with existing conditions, the following measure has been identified to address the inconsistency between Alternative 1 and the local jurisdictions' General Plans and other local land use plans.

Table 4.3 Plan Consistency Analysis for Alternative 2

Policy	Consistent?
CITY OF PASADENA PLAN CONSISTENCY ANALYSIS	
City of Pasadena General Plan	
Housing Element	
<p>Maintain Clearinghouse of Sites. Maintain clearinghouse of potential residential sites. These would include: City-owned and State property such as Caltrans PUSD surplus properties.</p>	<p>Consistent. All variations of Alternative 2 would result in the sale of 13 vacant surplus properties and 18 unoccupied residential surplus properties in the City of Pasadena. Together, these 31 properties represent potential future housing sites that could be included on the City of Pasadena’s list of such properties. Therefore, both variations of Alternative 2 would be consistent with this policy.</p>
<p>Buy Covenants on Caltrans Homes. Evaluate the potential of the City purchasing affordability covenants on Caltrans-owned single-family homes sitting vacant along the 710 Corridor.</p>	<p>Consistent. All variations of Alternative 2 would result in the sale of 13 unoccupied single-family residential surplus properties in the City of Pasadena. Caltrans has established a prospective buyer priority order for the purchase of the single-family residential surplus properties that stipulates that housing-related public or private affordable housing organizations are ranked fourth out of seven buyer priority categories. Thus, all variations of Alternative 2 would provide the potential for the City of Pasadena to purchase affordability covenants on some or all of the vacant single-family residential surplus properties in Pasadena. Therefore, all variations of Alternative 2 would be consistent with this policy.</p>
CITY OF SOUTH PASADENA PLAN CONSISTENCY ANALYSIS	
City of South Pasadena General Plan	
Land Use & Community Design Element	
<p>Housing Balance Goal 11, Policy 11.5: Reclaim Excess Right-of-Way Properties. Seek City’s exclusive right-to-negotiate with Caltrans on excess Route 710 right-of-way for purposes of providing ownership of affordable housing or open space amenities.</p>	<p>Consistent. All variations of Alternative 2 would result in the sale of 7 vacant surplus properties and 73 residential surplus properties in the City of South Pasadena. Caltrans has established a prospective buyer priority order for the purchase of the residential surplus properties that stipulates that housing-related public or private affordable housing organizations are ranked fourth out of seven buyer priority categories for the single-family residential properties and first out of four buyer priority categories for the multifamily residential properties. Caltrans has already provided the City of South Pasadena with an offer letter to purchase five of the seven vacant surplus properties. Thus, all variations of Alternative 2 would provide the potential for the City of South Pasadena to acquire some of the surplus properties within its city limits for the purposes of providing affordable housing or open space amenities. Therefore, all variations of Alternative 2 would be consistent with Goal 11, Policy 11.5.</p>
Housing Element	
<p>6.6.2.2 Assisting in the Provision of Housing: Housing Acquisition and Rehabilitation – Eight-Year Objective. The City’s objective is to continue to monitor surplus Caltrans properties in the 710 surface route corridor and provide technical assistance where feasible to non-profit affordable housing</p>	<p>Consistent. All variations of Alternative 2 would result in the sale of the surplus properties in the City of South Pasadena. Caltrans has established a prospective buyer priority order for the purchase of the residential surplus properties that stipulates that housing-related public or private affordable housing organizations are ranked fourth out of seven buyer priority categories for the single-family residential properties and first out of four buyer</p>

Table 4.3 Plan Consistency Analysis for Alternative 2

Policy	Consistent?
<p>developers pursuing acquisition and rehabilitation of any Caltrans declared surplus properties in the 710 surface route corridor as affordable housing.</p>	<p>priority categories for the multi-family residential properties. Thus, all variations of Alternative 2 would provide the City of South Pasadena with the opportunity to support nonprofit affordable housing developers pursuing acquisition and rehabilitation of surplus properties. Therefore, all variations of Alternative 2 would be consistent with Policy 6.6.2.2.</p>
<p>City of South Pasadena Mission Street Specific Plan</p>	
<p>Land Use & Community Design Element</p>	
<p>Guideline 1.9: Infill Residential. Seek opportunities to acquire, rehabilitate, and/or redevelop Caltrans-owned properties for creating affordable housing.</p>	<p>Consistent. All variations of Alternative 2 would result in the sale of 7 vacant surplus properties and 73 residential surplus properties in the City of South Pasadena. Caltrans has established a prospective buyer priority order for the purchase of the residential surplus properties that stipulates that housing-related public or private affordable housing organizations are ranked fourth out of seven buyer priority categories for the single-family residential properties and first out of four buyer priority categories for the multi-family residential properties. Caltrans has already provided the City of South Pasadena with an offer letter to purchase five of the seven vacant surplus properties. Thus, all variations of Alternative 2 would provide the potential for the City of South Pasadena to acquire some of the surplus properties within its city limits for the purposes of creating affordable housing. Therefore, all variations of Alternative 2 would be consistent with Guideline 1.9.</p>

Source: *Community Impact Assessment* (LSA 2015).
 Caltrans = California Department of Transportation
 PUSD = Pasadena Unified School District

However, Caltrans does not have the authority to compel the local jurisdiction to amend their General or Specific Plans.

LU-1 Alternative 1 would result in inconsistencies with local jurisdictions' General Plans and/or other location land use plans. If Alternative 1 is selected for implementation, the California Department of Transportation (Caltrans) will request applicable local jurisdictions to amend their General Plans and/or other local land use plans to reflect that the surplus properties would not be sold. However, because Caltrans has no authority to require a General Plan amendment, a significant unavoidable impact would remain until the General Plans are amended.

4.1.5.2 Alternative 2 – Action Alternative

None necessary.

4.1.6 Level of Significance After Mitigation

Because Caltrans does not have the authority to require a plan amendment as described above, a significant unavoidable impact would remain until the General Plans are amended by their respective local jurisdiction.

4.2 Community Factors

4.2.1 Community Demographics and Character

4.2.1.1 Existing Conditions

The analysis of the potential for the SR-710 Surplus Property Sales to result in impacts related to community demographics and character is described in this section. Technical studies used for this analysis included the CIA (LSA 2015) and the FRIR (Caltrans 2016).

The study area for community impacts is generally defined as the cities, communities, and neighborhoods in which physical improvements are proposed under a project. The study area for the SR-710 Surplus Property Sales includes select areas within the Cities of Pasadena and South Pasadena and the El Sereno neighborhood in the City of Los Angeles.

Community Demographics Data

The following demographic indicators were analyzed to understand each community's demographic characteristics and character.

- **Ethnicity:** In general, the homogeneity of a population contributes to higher levels of cohesion. Communities that are ethnically homogenous often speak the same language, hold similar beliefs, and share a common culture, and are therefore more likely to engage in social interaction on a routine basis.
- **Housing Occupancy:** Communities with a high percentage of owner-occupied residences are typically more cohesive because their population tends to be less mobile. Because they have a financial stake in their communities, homeowners often take a greater interest in what is happening in their communities than renters do. This means they often have a stronger sense of belonging to their communities.
- **Age:** In general, communities with a high percentage of elderly residents (65 years or older) tend to demonstrate a greater social commitment to their communities. This is because the elderly population, which includes retirees, often tend to be more active in the community because they have more time available for volunteering and participating in social organizations.
- **Household Size:** In general, communities with a high percentage of families with children are more cohesive than communities largely comprised of single people. This appears to be because children tend to establish friendships with other children in their communities. The social networks of children often lead to the establishment of friendships and affiliations among parents in the communities.
- **Transit-Dependent Population:** Communities with a high percentage of residents dependent on public transportation typically tend to be more cohesive than communities that are dependent on automobiles for transportation. This is because residents who walk or use public transportation for travel tend to engage in social interaction with each other more frequently than residents who travel by automobiles. Although the Census Bureau does not provide specific data regarding the percentage of the population that is dependent on public transportation for travel, the 2009–2013 American Community Survey (ACS) does provide a series of demographic data that can be used to serve as a proxy for transit-dependent population. For the purpose of this analysis, the transit-dependent population was calculated by taking the number of residents aged 15 and over, subtracting the number of persons living in group quarters, subtracting the number of vehicles available, and then dividing the difference by the population aged 15 and over.
- **Housing Tenure:** Communities with a high percentage of long-term residents are typically more cohesive because a greater proportion of the population has had time to establish social networks and develop an identity within the community.

The Census Bureau provides data regarding the year that each householder moved into their current housing unit. For the purpose of this analysis, those households that moved into their current residence in 1999 or earlier are considered long-term residents since they have lived in their current residence for more than 10 years.

Community demographics within the study area were analyzed to determine if the community and the census tracts that include surplus properties within it exhibit higher degrees of ethnic homogeneity, higher homeownership rates, larger household sizes, and higher percentages of transit-dependent, elderly, and long-term residents than the County overall. The discussion that follows presents the results of this analysis for each city and neighborhood in which the surplus properties are located.

Race and Ethnicity

As shown in Table 4.4, racial minorities comprise a larger share of the population in the City of Los Angeles (50.2 percent) and the neighborhood of El Sereno (54.9 percent) than in the County overall (49.7 percent). In the City of South Pasadena, one of the three census tracts has a higher percentage of racial minorities than the County.

The racial demographics of the eight census tracts in the community impacts study area vary, with racial minorities comprising between 22.5 percent and 54.9 percent. Of the eight census tracts in the community impacts study area, four census tracts have a higher percentage of racial minorities than the County.

As shown in Table 4.4, Hispanics/Latinos comprise a larger share of the population in the City of Los Angeles (48.5 percent) than in the County overall (47.7 percent). As described in the CIA (LSA 2015), the percentages of Hispanics/Latinos in the eight census tracts in the community impacts study area vary, with Hispanics/Latinos comprising between 13.6 percent and 85.4 percent of the population in those census tracts. Of the eight census tracts in the community impacts study area, three census tracts have a higher percentage of Hispanics/Latinos than the County. All three census tracts are located in the neighborhood of El Sereno.

Housing Occupancy

As shown in Table 4.4, the percentages of owner-occupied residences in the three cities that contain the surplus properties are slightly lower than in the County overall (47.7 percent).

Table 4.4 Community Demographic Indicators

Area	Racial Minority Population ¹	Hispanic/Latino Population ²	Owner-Occupied Residences	Elderly Residents (>64 years old)	Average Household Size (persons)	Transit-Dependent Population ³	Long-Term Residents (Moved in 1999 or Earlier) ⁴
Los Angeles County	49.7%	47.7%	47.7%	10.9%	2.98	26.7%	35.7%
City of Los Angeles	50.2%	48.5%	38.2%	10.5%	2.81	33.4%	29.8%
City of Pasadena	44.2%	33.7%	45.0%	13.5%	2.42	20.3%	30.2%
City of South Pasadena	45.7%	18.6%	46.8%	12.1%	2.43	10.9%	38.1%
Community Impacts Study Area							
Census Tracts in El Sereno							
2011.20	54.8%	82.1%	37.1%	8.0%	3.35	27.4%	38.5%
2015.01	54.9%	85.4%	41.4%	10.6%	3.53	34.8%	43.9%
2016.02	54.2%	84.1%	61.1%	12.1%	3.63	31.5%	44.4%
Census Tracts in Pasadena							
4637	24.6%	13.6%	57.0%	24.6%	1.96	8.2%	19.3%
4639	22.5%	15.3%	57.6%	30.8%	2.02	12.1%	44.7%
Census Tracts in South Pasadena							
4806	41.7%	18.9%	31.7%	10.7%	2.24	15.6%	27.7%
4807.03	45.4%	21.8%	58.3%	11.6%	2.53	3.8%	48.0%
4807.04	52.6%	20.6%	35.1%	9.8%	2.42	10.5%	31.0%

Source 1: *Community Impact Assessment* (LSA 2015).

Source 2: United States Census Bureau, 2010 Census, Table DP-1.

Source 3: United States Census Bureau, 2009–2013 ACS, Table DP03.

Note: **Italicized numbers in bold** indicate the values are higher than the County average.

¹ Includes individuals who identify themselves as Black/African American, Asian, Native Hawaiian/Pacific Islander, Native American/Native Alaskan, Some Other Race, or two or more races.

² Persons of Hispanic/Latino Origin may be of any race.

³ The transit-dependent population was calculated by taking the number of residents aged 15 and over (as reported in Table B01001 of the 2009–2013 ACS), subtracting the number of persons living in group quarters (as reported in Table B26001 of the 2009–2013 ACS), subtracting the number of vehicles available (as reported in Table B25046 of the 2007–2011 ACS), and then dividing the difference by the population aged 15 and over.

⁴ Includes those residents who moved into their current residence in 1999 or earlier, as reported in Table DP04 of the 2009–2013 ACS.

ACS = American Community Survey

Table 4.4 also shows that between 37.1 percent and 61.1 percent of the residences in the three census tracts within El Sereno that include the surplus properties are owner occupied, and that one of the three census tracts in the neighborhood that includes the surplus properties has a higher percentage of owner-occupied residences than the County overall. In the City of Pasadena, between 57.0 percent and 57.6 percent of the residences in the two census tracts that include the surplus properties are owner occupied, and both of these census tracts in the City of Pasadena have a higher percentage of owner-occupied residences than the County overall. Table 4.4 also shows that between 31.7 percent and 58.3 percent of the residences in the three census tracts in South Pasadena that include the surplus properties are owner occupied, and that one of the three census tracts in South Pasadena that includes the surplus properties has a higher percentage of owner-occupied residences than the County overall.

Elderly Residents

As shown in Table 4.4, the percentage of elderly residents in the City of Pasadena (13.5 percent) and the City of South Pasadena (12.1 percent) is higher than in the County overall (10.9 percent). As described in the CIA (LSA 2015), the percentages of the elderly population in the eight census tracts in the community impacts study area vary, with elderly residents comprising between 8.0 percent and 30.8 percent of the population in those census tracts. Of the eight census tracts in the community impacts study area, four census tracts have a higher percentage of elderly residents than the County overall.

Household Size

As shown in Table 4.4, the average household size in the three census tracts within the neighborhood of El Sereno that includes the surplus properties (3.50 persons) is slightly larger than in the County overall (2.98 persons). The average household sizes in the Cities of Pasadena (2.42 persons) and South Pasadena (2.43 persons) are smaller than in the County overall (2.98 persons).

Transit Dependency

As shown in Table 4.4, the percentage of transit-dependent residents in the community impacts study area is higher in the City of Los Angeles (33.4 percent) than in the County overall (26.7 percent). Table 4.4 also shows, on average, that the transit-dependent population in the three census tracts within the neighborhood of El Sereno that includes the surplus properties comprises a larger share (31.2 percent) of the population than the County overall. As described in the CIA (LSA 2015) and Table 4.4, the transit-dependent population in the five census tracts in the Cities of Pasadena and South Pasadena that the surplus properties ranges from 3.8 percent to 15.6 percent of the population, which is a lower percentage of transit-dependent residents than the County overall.

Housing Tenure

According to the methodology for evaluating community cohesion levels, individuals who have lived in their current residences for more than 10 years are considered long-term residents. As shown in Table 4.4, the City of South Pasadena has a slightly larger share of long-term residents (38.1 percent) than the County overall (35.7 percent). One of the three census tracts in South Pasadena that includes potential surplus properties has a higher percentage of long-term residents (48.0 percent) than the County (35.7 percent). Long-term residents comprise a slightly smaller share of the City of Pasadena's population (30.2 percent) than the County overall (35.7

percent). One of the census tracts that includes the surplus properties in the City of Pasadena has a higher percentage of long-term residents (44.7 percent) than the County (35.7 percent). As shown in Table 4.4, on average, long-term residents in the three census tracts within the neighborhood of El Sereno that includes the surplus properties comprise a larger share (42.3 percent) of the population than the County overall (35.7 percent).

Summary

As described above, each of the cities and neighborhood in the community impacts study area exhibits one or more community cohesion indicators in comparison to the overall County population. The Cities of Pasadena and South Pasadena and the neighborhood of El Sereno in the City of Los Angeles demonstrated three or more community cohesion indicators compared to the County overall. All but one of the census tracts in the community impacts study area exhibit one or more community cohesion indicators compared to the County population. Based on these factors, the study area exhibits a high degree of community cohesion.

4.2.1.2 Regulatory Requirements

Under CEQA, an economic or social change by itself is not to be considered a significant effect on the environment. However, if a social or economic change is related to a physical change, then social or economic change may be considered in determining whether the physical change is significant. Since this action would not result in physical changes to the environment, it does not need to consider changes to community character and cohesion in assessing the significance of the project's effects. However, given the potential for displacements under the proposed action, Caltrans is committed to examining the potential impacts to community cohesion and character.

4.2.1.3 Significance Criteria

As described in the previous section, this proposed action does not need to consider changes to community character and cohesion in assessing the significance of the action's effects. Therefore, there is no established CEQA significance criterion with regard to community character. However, Caltrans has decided to examine the potential for the proposed action to result in high and adverse effects on community character, cohesion, and continuity.

4.2.1.4 Impacts

Alternative 1 – No Action (No Sale) Alternative

Alternative 1 does not include the sale of any potential surplus properties. Caltrans would retain ownership of the surplus properties; it is assumed that none of the existing leases on the residential surplus properties would be terminated and all current tenants would be permitted to remain in their current homes as part of the proposed action. However, the existing leases may be terminated for unrelated (i.e., contractual) reasons. As a result, Alternative 1 would not result in adverse community character and cohesion effects related to the sale of potential surplus properties.

Per the Bureau of State Audits Report 2011-120 (2012 Audit), California's General Fund received approximately \$4.8 million in rent. Caltrans paid approximately \$5.5 million in property repairs. Funding for property maintenance is inconsistent, and work is slowed once funding is no longer available. Caltrans also contracts some of its property maintenance services out to private contractors in order to complete necessary repairs; public works contracts are subject to numerous competitive bidding laws. Competitive bidding laws exist to protect the public from misuse or waste of public funds, to provide all qualified bidders with a fair opportunity to enter the bidding process, and stimulate competition in a manner conducive to sound fiscal practices. By law, Caltrans has to select the lowest bidder to perform its property management services. However, what starts out as the lowest bid may not end up the lowest final cost. In the worst cases, the low bidder tries to make up for his or her low bid by squeezing the maximum amount out of change orders for work that another contractor may have included in their bid.

Alternative 2 – Action Alternative

Variations A and B

All the variation options of Alternative 2 would result in the sale of the surplus properties. The proposed action will not create a physical barrier that divides the neighborhood, and the proposed action does not have the potential to reduce the amount of social interaction that occurs within the neighborhood. However, due to the amount of potential relocations with regard to single-family residences (specifics on relocations are further discussed in Section 4.2.2), there is a possibility that community character may be altered due to displacements and subsequent new owners taking residence. Higher rates of homeownership generally positively correlate with a higher level of community cohesion, thereby benefiting the communities and neighborhoods in which the surplus properties are located. Therefore, it is anticipated that the displaced residents could be relocated near their

current location without disrupting the social fabric of the community in which they are located.

4.2.1.5 Avoidance, Minimization, and/or Mitigation Measures

The Affordable Sales Program (ASP) regulations process is happening concurrently with this Final Environmental Impact Report (FEIR) process and is striving to ensure that tenants who desire to purchase their single-family homes will be afforded every possible opportunity to do so. Additionally, the ASP regulations propose that the purchaser of a multifamily residence will rehabilitate and develop the property as limited equity cooperative housing or it will be used for low- and moderate-income rental or owner-occupied housing, with the present occupants afforded the first right of occupancy. If the proposed multifamily residence sale would result in displacements, it would be at the decision of the occupant. As such, no avoidance, minimization, and/or mitigation measures are necessary.

4.2.1.6 Level of Significance after Mitigation

No mitigation is required for the proposed action.

4.2.2 Relocations and Real Property Acquisition

4.2.2.1 Existing Conditions

The information in this section is based on the CIA (LSA 2015) and the FRIR (Caltrans 2016).

The community impacts study area and the existing land uses in the study area by jurisdiction are shown on Figure 4-1. The existing land use in the study area includes a wide range of residential, commercial/industrial, and vacant uses.

4.2.2.2 Regulatory Requirements

Caltrans will provide relocation assistance as applicable under California Government Code Sections 54235 through 54238.7, hereafter referred to as the “Roberti Act.” The Roberti Act references specific sections of the California Government Code (relocation advisory assistance provided by Section 7261; relocation benefits provided by paragraph (1) of subdivision (a) or subdivision (b) of Section 7262; the payments authorized by subdivision (b) or (c) of Section 7264; and the right for review of decision as provided by Section 7266 if the person is forced to relocate from the dwelling, as a direct result of the State agency's disposal of the excess real property within 90 days of the recordation of the deed from the State agency to a new owner) to describe the relocation assistance provided for eligible participants. The persons displaced as a result of this proposed action will receive Relocation

Assistance Program (RAP) benefits through California Government Code Section 54238.3.

All relocation services and benefits are administered without regard to race, color, national origin, or sex in compliance with Title VI of the Civil Rights Act (42 United States Code [USC] 2000d, et seq.). Please see Appendix C for a copy of the Caltrans Title VI Policy Statement.

4.2.2.3 Significance Criteria

Criteria for determining the significance of impacts related to population and housing are based on the CEQA Guidelines, Appendix G – Environmental Checklist. Impacts related to population and housing would be considered significant if they were to:

- **PH-B:** Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- **PH-C:** Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

4.2.2.4 Impacts

Alternative 1 – No Action (No Sale) Alternative

Alternative 1 would not result in the sale of any of the surplus properties by Caltrans. Should Caltrans retain ownership of the surplus properties, it is assumed that none of the existing leases on the residential surplus properties would be terminated, and all current tenants would be permitted to remain in their current homes as part of the proposed action. However, the existing leases may be terminated for unrelated (i.e., contractual) reasons. Impacts related to PH-B and PH-C would not occur under Alternative 1.

Alternative 2 – Action Alternative

According to the FRIR (Caltrans 2016) and data from the *Standardized Regulatory Impact Assessment* (SRIA) (Caltrans 2015) of the 460 properties, there are approximately 312 occupied single-family residences, 45 vacant single-family residences, and 41 occupied multifamily units. The remaining properties consist of unoccupied residential, commercial/industrial, vacant, and special use properties.

Caltrans will not subdivide ownership of multifamily residential properties. After consultation with the California State Transportation Agency (CalSTA), the California Housing Finance Agency (CalHFA), and the California Department of Housing and Community Development (HCD), it is assumed that all 41 occupied

multifamily properties and the 45 vacant single-family residences will be acquired by housing entities.

Housing entities are assumed to purchase an additional 64 single-family residences for concurrent resale to current occupants. Regulation requires housing entities to initially offer properties for either sale or rent to current tenants at fair market or affordable rents, based on income eligibility. Thus, it is assumed that current occupants of the multifamily properties and the 64 occupied single-family residences acquired by entities will not be displaced.

Also, it is further assumed that, of the occupied residential properties not purchased by housing-related entities (all single-family residences), approximately 100 will be sold at affordable prices to current occupants. The remaining 148 single-family properties will be sold at fair market value to non-occupants, thus resulting in 148 anticipated displaced households.

Table 4.5 shows that nonresidential displacements are not anticipated. The regulations require Caltrans to prioritize fair market offers to nonresidential parcels: first to former owners, then to current tenants in good standing. Based on the feedback during the rulemaking process for the ASP regulations and (lack of) inquiries made to Caltrans from former owners, it is anticipated that former owners of nonresidential properties will not be interested.

Table 4.5 Anticipated Displacements

Type of Residences	Units/Households Displaced ¹
Single-Family Residences	148
Multi-Family Units	0
Nonresidential	0

Source: Caltrans (July 2015).

¹ Based on the number of single-family residential units estimated to be sold to private individuals or entities other than existing tenants or housing-related public and private entities, as described in SRIA; excludes vacancies.

SRIA= *Standardized Regulatory Impact Assessment*

The FRIR (Caltrans 2016) identified comparable replacement housing units, including single-family and multifamily residential units available for sale or rent in the affected communities and surrounding areas that met decent, safe, and sanitary standards. According to the FRIR, a total of 12,128 units (7,979 units for rent and 4,149 units for sale) were available within the replacement housing area as of March 2, 2015.

Each city/neighborhood where displacements could occur has varying amenities, access to public services, transportation, shopping, and other neighborhood characteristics. Similarly, the neighborhoods and cities within the greater relocation area possess varying characteristics. However, care was taken to ensure that the replacement housing area included neighborhoods and cities with similar amenities to those present within the displacement area.

Based on the housing market research conducted for the FRIR (Caltrans 2016), it can be concluded that a sufficient number of residential replacement properties exist to accommodate the relocation of those tenants displaced as a result of the sale of the surplus properties in accordance with any variation of Alternative 2. Therefore, Impacts PH-B and PH-C would not reach a level of significance under any variation of Alternative 2. No additional housing would need to be constructed to relocate those who may be displaced, and the action would not displace or remove actual housing in the area.

Each displacement city/neighborhood has varying amenities, access to public services, transportation, shopping, and other neighborhood characteristics. Similarly, the neighborhoods and cities within the greater relocation area possess varying characteristics. However, care was taken to ensure that within the relocation area identified, there are several neighborhoods and cities with similar amenities to those of the respective cities/neighborhoods in the displacement area. Therefore, Impacts PH-B and PH-C would not reach a level of significance under any variation of Alternative 2. No additional housing would need to be constructed to relocate those who may be displaced, and the action would not displace or physically remove actual housing in the area.

Variation A Options 1 and 2

There is no difference in the number of displacements from residential surplus properties under Variation A Options 1 and 2.

Variation B Options 1 and 2

There is no difference in the number of displacements from residential surplus properties under Variation B Options 1 and 2. However, all of the sales and subsequent displacements would occur in a single year under Variation B Options 1 and 2. This would make it more difficult to find suitable single-family residential or multifamily residential replacement housing. Similar to Variation A, all 148 households would be displaced from single-family residential units. Approximately

148 residential units would be required to accommodate the displacement of these 148 households.

Based on the housing market research conducted for the FRIR, it can be concluded that a sufficient number of residential replacement properties exist to accommodate the relocation of those tenants displaced as a result of the sale of the surplus properties in accordance with Variation B Options 1 and 2.

4.2.2.5 Avoidance, Minimization, and/or Mitigation Measures

Occupants who become homebuyers will not be displaced. To increase the potential for occupants to obtain financing to purchase, and thereby avoid and minimize the number of people displaced, the following minimization measure would be implemented:

- R-1** To increase the potential for occupants to obtain financing to purchase, and thereby avoid and minimize the number of people displaced, the California Department of Transportation (Caltrans) is working with the California Housing Finance Agency to make more financing products available to prospective buyers than are currently readily available in the general lending market. Occupants who do not purchase will be provided advisory assistance, per the Roberti Act, to find and relocate to comparable housing, and Caltrans will seek assistance from agencies such as the United States Department of Housing and Urban Development (HUD) to find affordable housing.

4.2.2.6 Level of Significance After Mitigation

No mitigation is required for the proposed action.

4.2.3 Growth

4.2.3.1 Existing Conditions

Caltrans has no land use planning authority over any of the surplus properties once they are sold. Any future development on the surplus properties sold by Caltrans would be undertaken in accordance with the applicable General Plan land use and zoning designations in effect at the time that such development is proposed. Any proposed changes to the General Plan or zoning designations applicable to the surplus properties would be subject to a separate environmental review process undertaken by the city in which the affected properties are located. Nevertheless, in order to make a good-faith effort to analyze the growth impacts of the proposed action, the analysis below describes the potential for the proposed action to indirectly induce substantial

population growth in the study area cities by removing a potential obstacle to growth (i.e., State control over developable parcels). The growth analysis that follows assumes that implementation of the proposed action could help facilitate the development of the undeveloped surplus properties, but does not assume that any of the surplus properties not currently developed to their highest General Plan designated land use and density (i.e., that are underdeveloped) would be redeveloped to their maximum intensity.

As shown in Table 4.6, all three study area cities are forecast to experience increases in population ranging from 2.7 percent in South Pasadena to 14.6 percent in Los Angeles. The populations in all the study area cities are forecast to increase by 2035 based on adopted demographic projects for those areas. All three of the study area cities are forecast to experience increases in the number of households from 2008 to 2035, ranging from 2.9 percent in South Pasadena to 24.2 percent in Los Angeles over the same period.

Table 4.6 Growth Trends in the Action Area

Demographic Characteristic	2008	2020	2035	Projected 2008–2035 Growth Rate
Los Angeles County				
Population	9,778,000	10,404,000	11,353,000	16.1%
Households	3,228,000	3,513,000	3,852,000	19.3%
Employment	4,340,000	4,558,000	4,827,000	11.2%
City of Los Angeles (Including El Sereno)				
Population	3,770,500	3,991,700	4,320,600	14.6%
Households	1,309,900	1,455,700	1,626,600	24.2%
Employment	1,735,200	1,817,700	1,906,800	9.9%
City of Pasadena				
Population	135,300	143,400	152,500	12.7%
Households	54,500	58,400	61,400	12.7%
Employment	117,300	124,400	131,300	11.9%
City of South Pasadena				
Population	25,600	25,900	26,300	2.7%
Households	10,500	10,600	10,800	2.9%
Employment	9,000	9,500	10,000	11.1%

Source 1: Southern California Association of Governments, 2012 Regional Transportation Plan Growth Forecast.
 Source 2: Community Impact Assessment (2015).

Table 4.6 indicates that the study area cities are forecast to experience various rates of growth in population, households, and employment between 2008 and 2035; however, all three study area cities are forecast to experience population, household, and employment growth.

The forecast growth is expected to be affected by a number of factors, including: (1) local, State, and economic conditions; (2) local jurisdictions' consideration and approval of residential and nonresidential development consistent with adopted General Plans; (3) local policies and positions regarding growth, higher density land uses, and land uses not previously present in a city or in parts of a city; (4) the availability of vacant land for development; (5) opportunities for infill development at higher densities than the previous uses; and (6) the availability of infrastructure to support those land uses, including public utilities (water, sewer, waste collection), public services (libraries, fire, police), other utilities (electric, natural gas, telecommunications), and transportation (local and regional roads, and rail and bus services and facilities).

4.2.3.2 Regulatory Requirements

Consistent with the guidance provided in Section 15126.2(d) of the CEQA Guidelines, the proposed action was evaluated to determine if it "...could foster economic or population growth or construction of additional housing, either directly or indirectly, in the surrounding environment" by focusing on the potential for development to occur on the surplus properties and surrounding areas as a result of their sale by Caltrans to private individuals or entities, local government agencies, or nonprofit organizations.

4.2.3.3 Significance Criteria

Criteria for determining the significance of impacts related to population and housing growth are based on the CEQA Guidelines, Appendix G – Environmental Checklist. Impacts related would be considered significant if they were to:

- **PH-A:** Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

4.2.3.4 Impacts

Alternative 1 – No Action (No Sale) Alternative

Alternative 1 would not result in the sale of any of the surplus properties by Caltrans. Should Caltrans retain ownership of the surplus properties, it is assumed that none of the existing leases on the residential surplus properties would be terminated and all current tenants would be permitted to remain in their current homes. Impacts related to PH-A would not occur under Alternative 1.

Alternative 2 – Action Alternative

Variations A and B

The surrounding area within the action limits is urbanized and largely built out. Geographic and planning constraints limit the potential for growth to occur in the area. The proposed sale would make a small amount of vacant land (approximately 17 acres [ac]) available for future development, but would not influence any of the other factors that could affect growth. The vacant surplus properties are scattered over a 4.5-mile (mi) long corridor in a generally noncontiguous pattern that spans the three jurisdictions. The largest of the vacant surplus properties is approximately 2.1 ac in size, which means it would be difficult to consolidate enough of the vacant surplus properties to enable a large-scale development.

The potential surplus properties are currently served by all public service providers, including police protection service, fire protection services, schools, and libraries. Due to the relatively modest amount of development that could be accommodated on the vacant surplus properties, any potential increase in demand for public services and utilities would be very minor.

If the vacant surplus properties were to be developed, the resulting development would result in very modest increases in economic activity. During construction, a limited number of design, engineering, and construction-related jobs would be created, temporarily increasing economic activity until the development is completed. Upon completion, such development would result in minor population and employment increases.

No variation of Alternative 2 would result in the need to expand public services, encourage or facilitate economic development that could result in other activities that could significantly affect the environment, or involve a precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment. Impacts related to PH-A would be less than significant for all variations.

4.2.3.5 Avoidance, Minimization, and/or Mitigation Measures

No avoidance, minimization, and/or mitigation measures would be necessary.

4.2.3.6 Level of Significance After Mitigation

No mitigation is required for the proposed action.

4.2.4 Environmental Justice

4.2.4.1 Regulatory Requirements

As described in Chapter 1, the proposed action does not involve federal funding or require approval from any federal agencies and therefore is not subject to requirements of the National Environmental Policy Act of 1969 (NEPA) and is not required to comply with the provisions of Executive Order (EO) 12989 (described below). Nevertheless, Caltrans remains committed to the intent of EO 12898 and, given the project's relationship to affordable housing, Caltrans has decided to examine the potential for the proposed action to result in disproportionately high and adverse effects on environmental justice populations.

All projects involving a federal action (funding, permit, or land) must comply with EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, signed by President William J. Clinton on February 11, 1994. EO 12898 directs federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law. Low income is defined based on the Department of Health and Human Services poverty guidelines. For 2015, this was \$24,250 for a family of four.

All considerations under Title VI of the Civil Rights Act of 1964 and related statutes have also been included in this project. Caltrans' commitment to upholding the mandates of Title VI is demonstrated by its Title VI Policy Statement, signed by the Director, which can be found in Appendix C of this document.

4.2.4.2 Existing Conditions

The study area for the consideration of effects on environmental justice populations was defined as the residential surplus properties. Based on the fact that 175 households currently renting the residential surplus properties are enrolled in the Affordable Rent Program, it is assumed that approximately 50 percent of the households renting the residential surplus properties are low- and moderate-income households.

The methodology for conducting environmental justice analysis is typically based on guidance published by the Council on Environmental Quality (CEQ),¹ an advisory body that has oversight of the federal government's compliance with EO 12898 and NEPA. The CEQ guidance recommends identifying minority populations where either (a) the minority population of the affected area exceeds 50 percent, or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. The CEQ guidance also recommends identifying low-income populations in an affected area by applying the annual statistical poverty thresholds from the United States Census Bureau (Census Bureau) Current Population Reports, Series P-60 on Income and Poverty.

The CEQ guidelines for implementing environmental justice provide relevant information for consideration in the analysis; however, as described above, the proposed project is not required to comply with the provisions of EO 12898. Thus, the analysis that follows does not strictly adhere to the CEQ guidance pertaining to environmental justice analysis. As stated in the project description, Caltrans is required to comply with the provisions of the ASP regulations, which regulate the sale of residential surplus properties. A key goal of the ASP regulations is to preserve the supply of housing affordable to low- and moderate-income households. Because the project involves low- and moderate-income housing, the analysis that follows focuses on identifying disproportionately high and adverse effects on low-income populations rather than both minority- and low-income populations.

It is important to note that the CEQ guidance for identifying low income populations varies substantially from the methodology used to qualify low- and moderate-income households under the Affordable Rent Program, which relies on the Official State Income Limits published by HCD.

¹ Council on Environmental Quality, "Environmental Justice under the National Environmental Policy Act," December 10, 1997, <http://ceq.hss.doe.gov/nepa/regs/ej/justice.pdf>, accessed May 2, 2014.

The Census Bureau's preliminary weighted average poverty threshold for a family of four in 2014 was \$24,221.¹ The Census Bureau's poverty threshold is used throughout the United States and does not vary based on geographical location. In contrast, HCD publishes separate income limits for extremely low-, very low-, low-, and moderate-income households for California's 58 counties. The State Income Limits published by HCD apply to designated programs and are to be used to determine applicant eligibility based on household income and calculate affordable housing costs for applicable housing assistance programs like the Affordable Rent Program offered by Caltrans. According to HCD, the 2014 income limits for the low- and moderate-income categories for four-person households in Los Angeles County were \$68,300 and \$77,750, respectively.²

Although it would be preferable to isolate the low-income population from the moderate-income population for purposes of this environmental justice analysis, the SRIA does not provide an income level breakdown for the tenants who qualified for the Affordable Rent Program. Therefore, it is assumed that all of the households that qualify for the Affordable Rent Program are low income households, which translates to approximately 50 percent of the households renting the residential surplus properties. The assumptions and professional estimates in the following analysis were formed with consultation and input from Caltrans Division of Right of Way, CalSTA, CalHFA, and HCD.

4.2.4.3 Significance Criteria

As described in Section 4.2.3.1, this action is not subject to federal requirements, although Caltrans remains committed to the intent of EO 12898. As such, there is no established CEQA significance criterion regarding environmental justice.

¹ United States Census Bureau, Preliminary Estimate of Weighted Average Poverty Thresholds for 2014, January 16, 2015, <http://www.census.gov/hhes/www/poverty/data/threshld/14PRELIMINARY.xls>, accessed February 26, 2015.

² California Department of Housing and Community Development, State Income Limits for 2014, <http://www.hcd.ca.gov/hpd/hrc/rep/state/inc2k14.pdf>, accessed on February 28, 2015.

4.2.4.4 Impacts

The analysis in this section specifically addresses whether Alternatives 1 and 2 of the SR-710 Surplus Property Sales would result in adverse impacts that are appreciably more severe or greater in magnitude on environmental justice populations than the adverse effects experienced by non-environmental justice populations, after taking mitigation and offsetting benefits into account.

Alternative 1 – No Action (No Sale) Alternative

Alternative 1 would maintain the status quo on the surplus properties and would not make any of the surplus properties available for sale to existing tenants, including both low-income and non-low-income populations. Therefore, Alternative 1 would not result in any adverse to either environmental justice or non-environmental justice populations.

Alternative 2 – Action Alternative Variations A and B

Implementation of any variation of Alternative 2 would result in the sale of 398 residential surplus properties. As described in Section 4.2.2, Relocations and Real Property Acquisition, approximately 100 of these residential surplus properties are anticipated to be sold at affordable prices to current tenants of low or moderate income, and approximately 150 of the residential surplus properties are anticipated to be sold to housing-related public or private entities, 64 of which are anticipated to be concurrently resold to existing tenants.

Although the sale of the residential surplus properties under any variation of Alternative 2 would result in the termination of the Affordable Rent Program, it is estimated that approximately two-thirds of the 175 low-income households currently participating in the Affordable Rent Program would be able to purchase their current rental units at affordable prices, while some of the other low-income households currently participating in the Affordable Rent Program may be able to remain in their homes if they are purchased by housing-related public or private entities. Therefore, it is assumed that the majority of the low-income population living in the residential surplus properties would be able to remain in their current homes.

Because no variation of Alternative 2 is expected to result in the displacement of a disproportionate number of low-income residents or result in significant, unavoidable impacts on low-income (or non-low-income) populations, it is reasonable to conclude that no variation option of Alternative 2 would result in adverse impacts that are

appreciably more severe or greater in magnitude on environmental justice populations than the adverse effects experienced by non-environmental justice populations.

4.2.4.5 Avoidance, Minimization, and/or Mitigation Measures

In order to ensure that low-income households are given a fair opportunity to purchase and remain in their homes, existing statute Government Code 54235–54238.7 stipulates that homes will be offered to low- or moderate-income tenants at affordable prices. The ASP regulations implementing the statute and governing the sale of the properties ensure that every opportunity will be afforded to low- and moderate-income households to purchase their homes, thereby avoiding and minimizing the relocation of these households.

4.2.4.6 Level of Significance After Mitigation

No mitigation is required for the proposed action.

4.3 Cultural Resources

4.3.1 Regulatory Requirements

The term “cultural resources” as used in this document refers to all “built environment” resources (structures, bridges, railroads, water conveyance systems, etc.), culturally important resources, and archaeological resources (both prehistoric and historic), regardless of significance. Laws and regulations pertaining to cultural resources include CEQA and California Public Resources Code (PRC) Section 5024 and Section 5024.5.

Historical resources are considered under CEQA, as well as under PRC Section 5024.1, which established the California Register of Historical Resources (California Register). PRC Section 5024 requires State agencies to identify and protect State-owned resources that meet the National Register of Historic Places (National Register) listing criteria. It further specifically requires Caltrans to inventory State-owned structures in its rights-of-way. Sections 5024(f) and 5024.5 require State agencies to provide notice to and consult with the State Historic Preservation Officer (SHPO) before altering, transferring, relocating, or demolishing State-owned historical resources that are listed on or are eligible for inclusion in the National Register or are registered or eligible for registration as California Historical Landmarks.

In January 2015, a *Memorandum of Understanding Between the California Department of Transportation and the California State Historic Preservation Officer*

Regarding Compliance with Public Resources Code 5024 and Governor's Executive Order W-26-92 (5024 MOU) was executed for Caltrans projects where the undertaking may affect State-owned historical resources. The 5024 MOU implements the State's environmental protection laws (PRC Sections 5024 and 5024.5), streamlining the process and delegating certain responsibilities to Caltrans' Division of Environmental Analysis Cultural Studies Office Chief.

4.3.2 Existing Conditions

The information in this section is based on the two-volume *Historic Resources Compliance Report* (HRCR; Caltrans 2015) prepared for the proposed action to identify, to the extent practical, cultural resources in the Project Area Limits (PAL). Cultural resources in the PAL were identified in Volume I (Historic Properties) of the HRCR. Volume II (Non-Historic Properties) identifies all other State-owned properties in the SR-710 corridor.

To compile the list of non-historic properties, Caltrans consulted the *Historical Resources Evaluation Report (HREER) for Properties Owned by the California Department of Transportation (Caltrans) in the State Route 710 Corridor in Los Angeles, South Pasadena, and Pasadena*, Volumes I–III.^{1,2} Because the non-historic properties were documented and received concurrence from SHPO on their determinations of eligibility within the last 5 years, the Volume II of the HRCR did not require additional field work or new determinations of eligibility.

The PAL boundaries were established as the legal property boundaries for each parcel to be sold. Properties located in a historic district are relatively dense and close together.

¹ Volume I of the HREER was originally prepared by Andrew Hope, Caltrans Architectural Historian, in February 2008 and was updated in 2014.

² Volumes II and III of the HREER were also originally prepared by Andrew Hope, Caltrans Architectural Historian, in April 2008 and June 2008, respectively. Volumes II and III were subsequently updated in October 2013 by Gloria Scott, Senior Environmental Planner and Architectural Historian for Caltrans Headquarters in Sacramento, CA.

Between December 2014 and March 2015, the following repositories and resources were used to access historical information relevant to properties within and in the vicinity of the PAL.

- National Register
- California Register
- California Inventory of Historic Resources
- California Historical Landmarks
- California Points of Historical Interest
- California Historical Resources Information System (CHRIS)
- District 7 Cultural Resources Files for SR-710
- Caltrans Cultural Resources Database (CCRD)
- SR-710 North Study Historic Property Survey Report

The following historical institutions, groups, and individuals were also contacted:

- Los Angeles Office of Historic Resources, Department of City Planning, Attn: Janet Hansen
- City of Pasadena, Planning and Community Development Department, Attn: Jason Wasmund and Leon White, Principal Planner
- City of South Pasadena, Planning and Building Department, Attn: David G. Watkins, AICP, and John Mayer, Senior Planner
- California Preservation Foundation, Attn: Cindy Heitzman, Executive Director
- El Sereno Historical Society, Attn: Yolie Garcia
- Los Angeles City Historical Society
- Los Angeles Conservancy, Attn: Adrian Scott Fine, Director of Advocacy
- National Trust for Historic Preservation, Attn: Elizabeth S. Merritt, Deputy General Counsel
- National Trust for Historic Preservation, Attn: Chris Morris, Los Angeles Field Director
- Pasadena Heritage, Attn: Susan N. Mossman, Executive Director, and Jesse Lattig, Preservation Director
- South Pasadena Preservation Foundation, Inc. Attn: Joanne Nuckols
- West Pasadena Residents' Association

Of the 460 properties in the PAL, a total of 113 properties are historical resources. There are 75 properties in the City of Pasadena, 13 properties in the City of South

Pasadena, and 10 properties in the City of Los Angeles that are listed in or determined eligible for listing in the National Register. The historical resources include contributors to 7 historic districts as well as 24 properties that are individually eligible for the National Register. In addition, the 15 historical resources in South Pasadena identified in Table 4.7 are not eligible for the National Register but are considered historical resources for the purposes of CEQA. The surplus properties that are National Register listed or eligible are listed in Table 4.8 and shown on Figure 4-3.

The resource(s) included in Table 4.8 that are within the PAL were previously listed or determined eligible for inclusion in the National Register, were previously determined to meet California Register eligibility criteria, and/or were previously determined to be historical resource(s) for purposes of CEQA pursuant to PRC 15064.5(a), and the determinations are still valid.

4.3.3 Significance Criteria

Criteria for determining the significance of impacts to cultural resources are based on the CEQA Guidelines, Appendix G – Environmental Checklist. Impacts to cultural resources would be considered significant if they were to:

- **CR-A:** Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.
- **CR-B:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- **CR-C:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- **CR-D:** Disturb any human remains, including those interred outside of formal cemeteries.

4.3.4 Impacts

The potential for the SR-710 Surplus Property Sales alternatives to affect cultural resources is based on the Finding of No Adverse Effect for the SR-710 Surplus Property Sales (HRCR; Caltrans 2015). The SHPO concurred with the Finding of No Adverse Effect, as documented by the letter dated July 28, 2016, located in Appendix J.

Table 4.7 City of South Pasadena CEQA Resources

PAL Map Page No.	Caltrans Parcel No.	Address	Status	Date of Determination
1	68168	2042 Alpha Ave.	Listed on South Pasadena Cultural Heritage Inventory	July 2014
9	68575	226 & 226 ½ Beacon Ave.	Listed on South Pasadena Cultural Heritage Inventory	July 2014
2	45423	705 Bonita Dr.	Listed on South Pasadena Cultural Heritage Inventory	July 2014
2	67332	801 Bonita Dr.	Listed on South Pasadena Cultural Heritage Inventory	July 2014
9	61337	216 Fairview Ave.	Listed on South Pasadena Cultural Heritage Inventory	July 2014
7	49741	1035 Foothill St.	Listed on South Pasadena Cultural Heritage Inventory	July 2014
9	68599	217 Fremont Ave.	Listed on South Pasadena Cultural Heritage Inventory	July 2014
9	68600	225 Fremont Ave.(rock wall only)	Listed on South Pasadena Cultural Heritage Inventory	July 2014
3	68262	1724 Gillette Crescent	Listed on South Pasadena Cultural Heritage Inventory	July 2014
5	61161	1134-1136 Glendon Way	Listed on South Pasadena Cultural Heritage Inventory	July 2014
7	68494	1037 Grevelia St.	Listed on South Pasadena Cultural Heritage Inventory	July 2014
7	980546	1010 & 1010 ½ Hope St.	Listed on South Pasadena Cultural Heritage Inventory	July 2014
4	68347	916 Lyndon St.	Listed on South Pasadena Cultural Heritage Inventory	July 2014
8	47416	500/508 Meridian Ave. (rock wall/stair only)	Listed on South Pasadena Cultural Heritage Inventory	July 2014
2	61345	1821 Meridian Ave.	Listed on South Pasadena Cultural Heritage Inventory	July 2014

Source: Caltrans (July 2015).

Table 4.8 Historical Resources on the Surplus Properties

PAL Map Page No.	Caltrans Parcel No.	Address	Description	Status	Date of Determination
City of Pasadena					
10	47977	169 Arlington Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48196	180 Arlington Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48199	181 Arlington Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48193	216 Arlington Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
11	48224	203 Bellefontaine St.	Markham Place Historic District	National Register listed as a district contributor	March 2013
11	48223	235 Bellefontaine St.	Markham Place Historic District	National Register listed as a district contributor	March 2013
12	48247	202-204 W. California Blvd.	Markham Place Historic District	National Register listed as a district contributor	March 2013
12	48246	206-216 W. California Blvd.	Markham Place Historic District	National Register listed as a district contributor and individually eligible property	March 2013 April 2013
9	48163	181 Columbia St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
9	48156	231 Columbia St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48197	177 W. Glenarm St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48195	185 W. Glenarm St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	68799	165 Hurlbut St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48215	177 Hurlbut St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48185	202 Madeline Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	47445	205 Madeline Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48187	215 Madeline Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995

Table 4.8 Historical Resources on the Surplus Properties

PAL Map Page No.	Caltrans Parcel No.	Address	Description	Status	Date of Determination
City of Pasadena (Continued)					
10	45739	218 Madeline Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48188	225 Madeline Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48184	230 Madeline Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
12	46843	535 S. Pasadena Ave.	Markham Place Historic District	Parsonage is National Register listed as a district contributor. Three Mid-Century buildings are Individually eligible properties.	March 2013 May 2010
12	48248	595 S. Pasadena Ave. (190 W. California Blvd.)	Markham Place Historic District	National Register listed as a district contributor and individually eligible property	March 2013 May 2001
11	48243	679 S. Pasadena Ave.	Markham Place Historic District	National Register listed as a district contributor and individually eligible property	March 2013
11	48243	703 S. Pasadena Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
11	48228	737 S. Pasadena Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
11	48227	763 S. Pasadena Ave.	Markham Place Historic District	National Register listed as a district contributor and individually eligible property	March 2013 July 2002
11	48226	765 S. Pasadena Ave.	Markham Place Historic District	National Register listed as a district contributor and individually eligible property	March 2013 July 2002
11	48225	779 S. Pasadena Ave.	Markham Place Historic District	National Register listed as a district contributor and individually eligible property	March 2013 March 2003
11	48225	801 S. Pasadena Ave.	Markham Place Historic District	National Register listed as a district contributor and individually eligible property	March 2013 July 2002
11	48219	866 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined eligible for the National Register as a district contributor and individually eligible property	March 1983 November 1995 October 2007

Table 4.8 Historical Resources on the Surplus Properties

PAL Map Page No.	Caltrans Parcel No.	Address	Description	Status	Date of Determination
City of Pasadena (Continued)					
11	48218	876 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
11	48217	888 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
11	48216	894 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48214	900 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined eligible for the National Register as a district contributor and individually eligible property	March 1983 November 1995 October 2007
10	48198	1000 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined eligible for the National Register as a district contributor and individually eligible property	March 1983 November 1995 September 2004
10	48194	1030 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined eligible for the National Register as a district contributor and individually eligible property	March 1983 November 1995 October 2007
10	48191	1041 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined eligible for the National Register as a district contributor and individually eligible property	March 1983 November 1995 May 2007
10	48190	1051 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined eligible for the National Register as a district contributor and individually eligible property	March 1983 November 1995 October 2007
10	48189	1059 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48178	1080 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48177	1090 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48176	1100 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48175	1112 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined eligible for the National Register as a district contributor and individually eligible property	March 1983 November 1995 October 2008
10	48174	1120 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995

Table 4.8 Historical Resources on the Surplus Properties

PAL Map Page No.	Caltrans Parcel No.	Address	Description	Status	Date of Determination
City of Pasadena (Continued)					
10	48172	1140-1142 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
9	48171	1150 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
9	47776	1190 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
9	48160	1191 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
9	48159	1199 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined eligible for the National Register as a district contributor and individually eligible property	March 1983 November 1995
9	48168	1200 S. Pasadena Ave.	Pasadena Avenue Historic District	Determined eligible for the National Register as a district contributor and individually eligible property	March 1983 November 1995
9	48158	1207 S. Pasadena Ave.		Not a district contributor, Individually eligible property	May 2013
12	48241	584 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
12	48240	600 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
12	48239	602 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
12	48238	620 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
12	48237	628 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
12	48236	640 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
12	48235	646 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
11	48234	650 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
11	49399	670 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013

Table 4.8 Historical Resources on the Surplus Properties

PAL Map Page No.	Caltrans Parcel No.	Address	Description	Status	Date of Determination
City of Pasadena (Continued)					
11	48233	678 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
11	48232	696 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor and individually eligible property	March 2013 May 2003
11	48231	714 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
11	48230	726 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
11	48229	734 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
11	41595	762 S. St. John Ave.	Markham Place Historic District	National Register listed as a district contributor	March 2013
9	48170	180 W. State St.	Pasadena Avenue Historic District	Determined eligible for the National Register as a district contributor and individually eligible property	March 1983 November 1995
9	48161	214 W. State St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
9	41598	224 & 232 W. State St.	Pasadena Avenue Historic District	Determined eligible for the National Register as a district contributor and individually eligible property	March 1983 November 1995
9	48181	225 W. State St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
9	61218	237 W. State St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
10	48211	212 Wigmore Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
11	48213	215 Wigmore Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
11	48212	231 Wigmore Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
11	49584	245 Wigmore Dr.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995

Table 4.8 Historical Resources on the Surplus Properties

PAL Map Page No.	Caltrans Parcel No.	Address	Description	Status	Date of Determination
City of South Pasadena					
2	68213	816 Bonita Dr.		Individually eligible property	March 1983
8	68528	1005 Buena Vista St.	Buena Vista Historic District	Individually listed property and determined eligible as a district contributor	April 1974
9	68584	1015 Columbia St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	October 2013
9	49685	1101 Columbia St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	October 2013
9	61338	1109 Columbia St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
9	68598	1131 Columbia St.	Pasadena Avenue Historic District	Determined Eligible for the National Register	March 1983 November 1995
5	61162	1110 Glendon Way	South of Mission Historic District	Determined Eligible for the National Register	March 1983
5	68355	1131 Glendon Way	South of Mission Historic District	Determined Eligible for the National Register	March 1983
7	68439	726 Meridian Ave./1002 Hope St.& 1008 Hope St.	North of Mission Historic District	Determined Eligible for the National Register	March 1983
5	67109	911 Monterey Rd.		Individually eligible property	March 1983
8	67320	495 Prospect Ave.	Prospect Circle Historic District	Determined Eligible for the National Register	October 2013
8	68629	511 Prospect Ave.	Prospect Circle Historic District	Determined Eligible for the National Register	October 2013
8	68553	400 Prospect Circle	Prospect Circle Historic District	Determined Eligible for the National Register	April 1987
City of Los Angeles					
1	47417	4411 Alpha St.	Short Line Villa Historic District	Determined Eligible for the National Register	11/20/95 – Keeper Determination 8/28/2014 – Reconfirmed by SHPO
1	48134	4417 Alpha St .	Short Line Villa Historic District	Determined Eligible for the National Register	11/20/95 – Keeper Determination 8/28/2014 – Reconfirmed by SHPO

Table 4.8 Historical Resources on the Surplus Properties

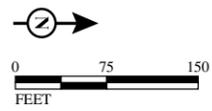
PAL Map Page No.	Caltrans Parcel No.	Address	Description	Status	Date of Determination
City of Los Angeles (Continued)					
1	48141	4451 Alpha St .	Short Line Villa Historic District	Determined Eligible for the National Register	11/20/95 – Keeper Determination 8/28/2014 – Reconfirmed by SHPO
1	48143	4507 Alpha St .	Short Line Villa Historic District	Determined Eligible for the National Register	11/20/95 – Keeper Determination 8/28/2014 – Reconfirmed by SHPO
1	48145	5500 Atlas St .	Short Line Villa Historic District	Determined Eligible for the National Register	11/20/95 – Keeper Determination 8/28/2014 – Reconfirmed by SHPO
1	48146	5506 Atlas St .	Short Line Villa Historic District	Determined Eligible for the National Register	11/20/95 – Keeper Determination 8/28/2014 – Reconfirmed by SHPO
1	48147	5512 Atlas St .	Short Line Villa Historic District	Determined Eligible for the National Register	11/20/95 – Keeper Determination 8/28/2014 – Reconfirmed by SHPO
1	48150	5513 Atlas St .	Short Line Villa Historic District	Determined Eligible for the National Register	11/20/95 – Keeper Determination 8/28/2014 – Reconfirmed by SHPO
1	48144	5501 Berkshire Dr.	Short Line Villa Historic District	Determined Eligible for the National Register	11/20/95 – Keeper Determination 8/28/2014 – Reconfirmed by SHPO
1	43710	5524 Kendall Ave.	Short Line Villa Historic District	Determined Eligible for the National Register	11/20/95 – Keeper Determination 8/28/2014 – Reconfirmed by SHPO

Source: Caltrans (July 2015).
 Caltrans = California Department of Transportation
 PAL = Project Area Limits



LEGEND

- Caltrans Owned Property
- Caltrans Does Not Own Property
- Historic Property (National Register Eligible or Listed)
- Historic Property (South Pasadena CEQA Resource)
- Non-historic Property
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 I:\CDT1502\GIS\CTHistoricProperties.mxd (7/1/2015)

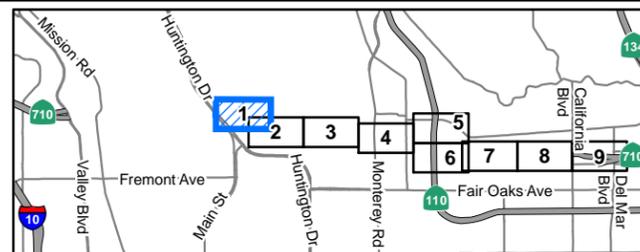


FIGURE 4-3
 Sheet 1 of 9

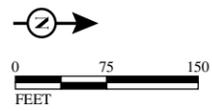
This page intentionally left blank



LEGEND

- Caltrans Owned Property
- Caltrans Does Not Own Property
- Historic Property (National Register Eligible or Listed)
- Historic Property (South Pasadena CEQA Resource)
- Non-historic Property

City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)

I:\CDT1502\GIS\CTHistoricProperties.mxd (7/1/2015)

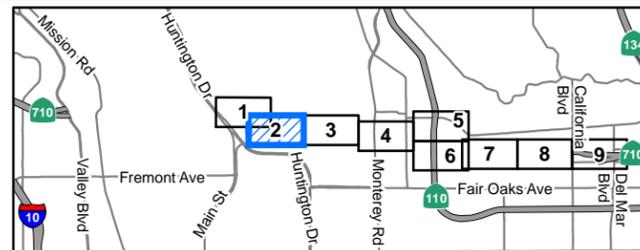


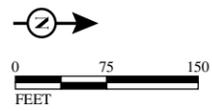
FIGURE 4-3
Sheet 2 of 9

This page intentionally left blank



LEGEND

- Caltrans Owned Property
- Caltrans Does Not Own Property
- Historic Property (National Register Eligible or Listed)
- Historic Property (South Pasadena CEQA Resource)
- Non-historic Property
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)

I:\CDT1502\GIS\CTHistoricProperties.mxd (7/1/2015)

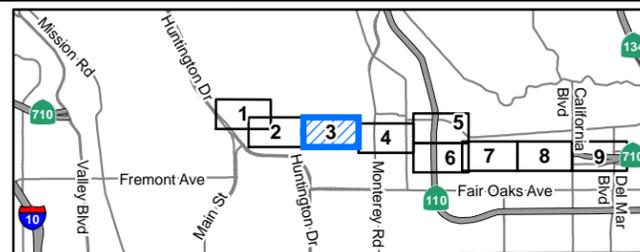


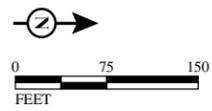
FIGURE 4-3
Sheet 3 of 9

This page intentionally left blank



LEGEND

- Caltrans Owned Property
- Caltrans Does Not Own Property
- Historic Property (National Register Eligible or Listed)
- Historic Property (South Pasadena CEQA Resource)
- Non-historic Property
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)

I:\CDT1502\GIS\CTHistoricProperties.mxd (7/1/2015)

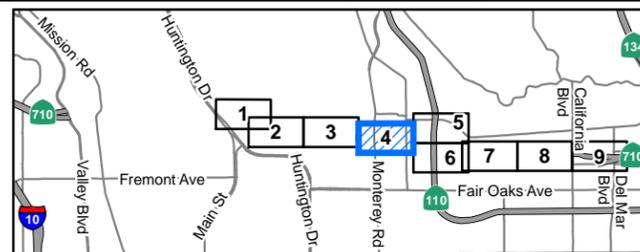


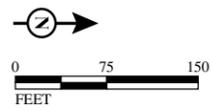
FIGURE 4-3
Sheet 4 of 9

This page intentionally left blank



LEGEND

- Caltrans Owned Property
- Caltrans Does Not Own Property
- Historic Property (National Register Eligible or Listed)
- Historic Property (South Pasadena CEQA Resource)
- Non-historic Property
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)

I:\CDT1502\GIS\CTHistoricProperties.mxd (7/1/2015)

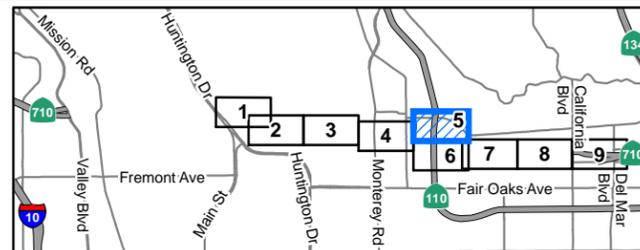


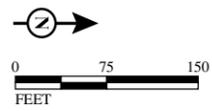
FIGURE 4-3
Sheet 5 of 9

This page intentionally left blank



LEGEND

- Caltrans Owned Property
- Caltrans Does Not Own Property
- Historic Property (National Register Eligible or Listed)
- Historic Property (South Pasadena CEQA Resource)
- Non-historic Property
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)

I:\CDT1502\GIS\CTHistoricProperties.mxd (7/1/2015)

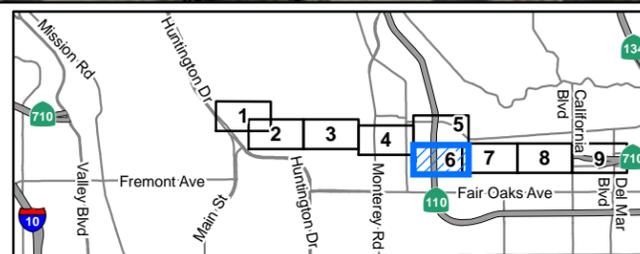


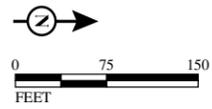
FIGURE 4-3
Sheet 6 of 9

This page intentionally left blank



LEGEND

- Caltrans Owned Property
- Caltrans Does Not Own Property
- Historic Property (National Register Eligible or Listed)
- Historic Property (South Pasadena CEQA Resource)
- Non-historic Property
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)

I:\CDT1502\GIS\CTHistoricProperties.mxd (7/1/2015)

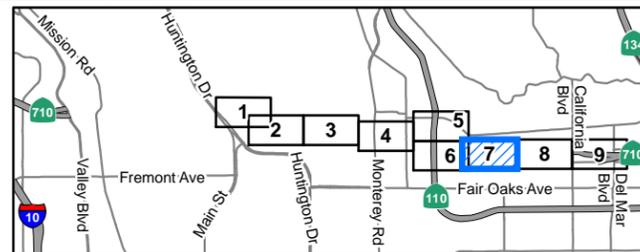
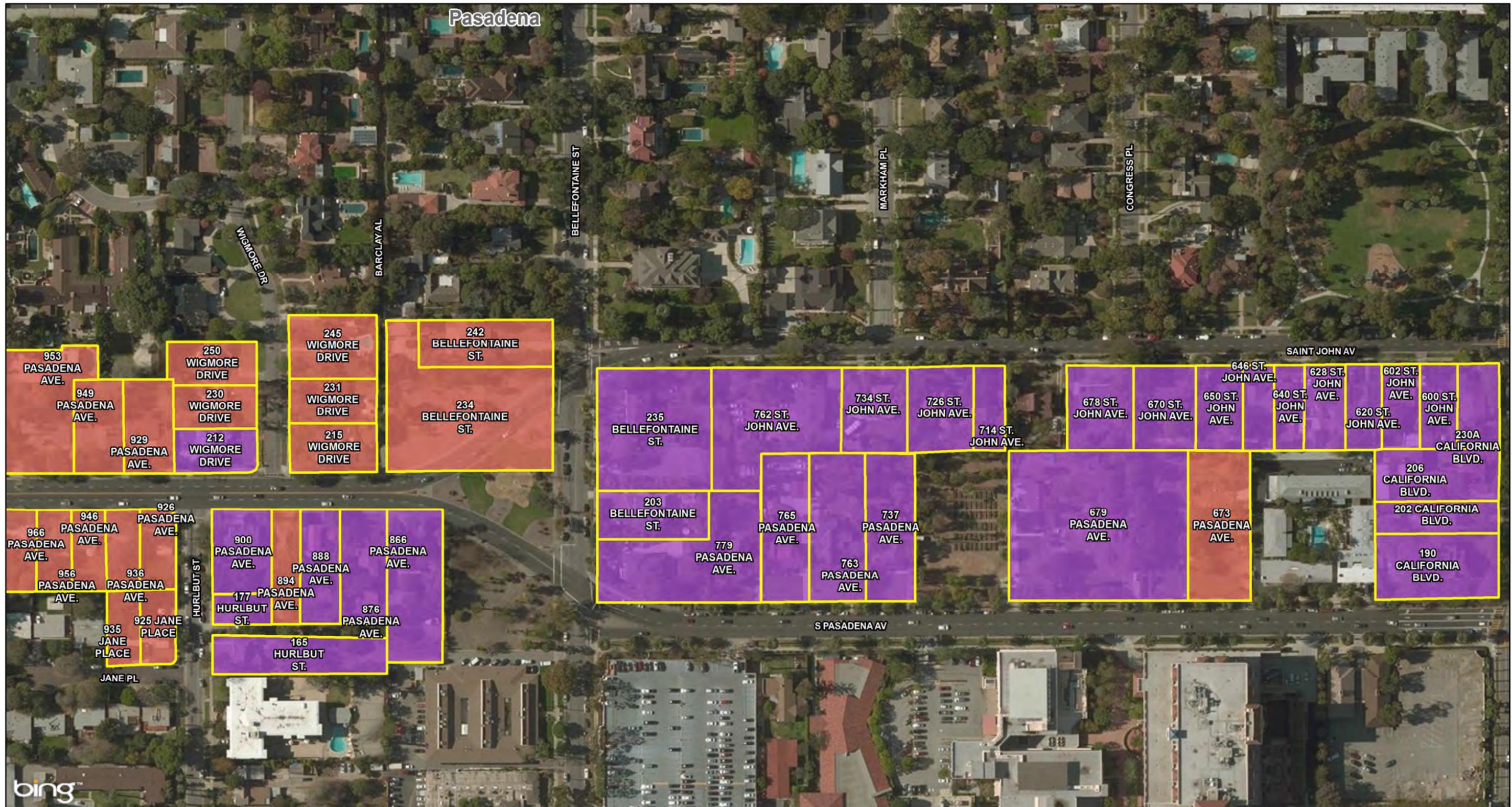


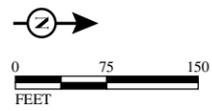
FIGURE 4-3
Sheet 7 of 9

This page intentionally left blank



LEGEND

- Caltrans Owned Property
- Caltrans Does Not Own Property
- Historic Property (National Register Eligible or Listed)
- Historic Property (South Pasadena CEQA Resource)
- Non-historic Property
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)

I:\CDT1502\GIS\CTHistoricProperties.mxd (7/1/2015)

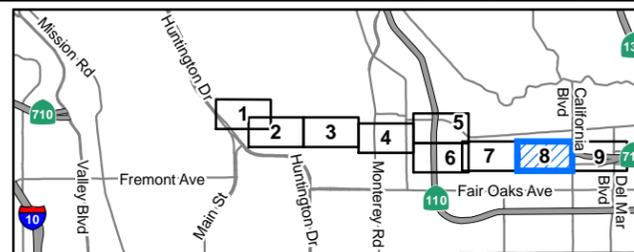


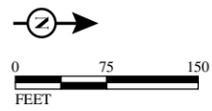
FIGURE 4-3
Sheet 8 of 9

This page intentionally left blank



LEGEND

- Caltrans Owned Property
- Caltrans Does Not Own Property
- Historic Property (National Register Eligible or Listed)
- Historic Property (South Pasadena CEQA Resource)
- Non-historic Property
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)

I:\CDT1502\GIS\CTHistoricProperties.mxd (7/1/2015)

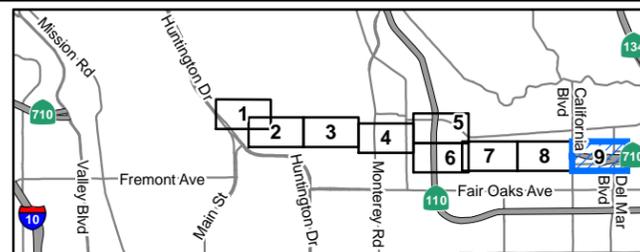


FIGURE 4-3
Sheet 9 of 9

This page intentionally left blank

4.3.4.1 Alternative 1 – No Action (No Sale) Alternative

Alternative 1 does not propose to sell any of the 460 potential surplus properties. As a result, Alternative 1 would not result in any effects related to historical resources associated with the proposed sale. Impacts CR-A through CR-D would not occur.

4.3.4.2 Alternative 2 – Action Alternative

Variations A and B

The sale of the potential surplus properties has the potential for significant impacts according to PRC 5024.5(a), which states “No state agency shall alter the original or significant historical features or fabric, or transfer, relocate, or demolish historical resources on the master list maintained pursuant to subdivision (d) of Section 5024 without, early in the planning processes, first giving notice and a summary of the proposed action to the officer (SHPO)...for review and comment.” Further, 5024.5 (b) states “If the officer determines that a proposed action will have an adverse effect on a listed historical resource, the head of the state agency having jurisdiction over the historical resource and the officer shall adopt prudent and feasible measures that will eliminate or mitigate the adverse effects.”

Pursuant to CEQA, as outlined in Section 15064.5(b)(4) of the CEQA Guidelines, a lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of a historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.

Table 4.8 lists the National Register listed or determined eligible for listing properties within the PAL for Alternative 2. Caltrans Professionally Qualified Staff (PQS), pursuant to CEQA Guidelines Section 15064.5(b)(3), has determined that for the 98 historical resources listed in Table 4.8, there is no substantial adverse change because the properties would be transferred (sold) with historic covenants and/or agreements that will provide protection of each property’s character-defining features.

Additionally, per California Civil Code Section 815, Caltrans will ensure that any agreements to protect historical resources will be enforceable by way of third-party monitoring by a non-profit organization.

Caltrans PQS, pursuant to CEQA Guidelines Section 15064.5(b)(3), has determined that for the CEQA-only historical resources listed in Table 4.7 in the City of South Pasadena, there is no substantial adverse change because the resources will be protected under City of South Pasadena Municipal Code Section 2.64 (demolition and

alteration). Additionally, because the City of South Pasadena is a Certified Local Government (CLG), the City Planning Commission, Design Review Board, and Cultural Heritage Commission all have specific responsibilities for reviewing alterations to existing historical resources in their jurisdiction that meet the Secretary of the Interior's Standards for the Treatment of Historic Properties.

It is expected that these measures will avoid potentially substantial adverse changes in the significance of a historical resource as defined in Section 15064.5 (CR-A) that are reasonably foreseeable after the properties have been transferred out of State ownership. All feasible steps will be taken to ensure that the appropriate protective covenants are conveyed upon the sale of any historic resources. When required, a covenant will be attached on the subject property's deed prior to being sold to the new owners.

The proposed action will not disturb any native soil; therefore, the remaining significance criteria (CR-B, CR-C and CR-D) do not apply to this action, and impacts related to them will not occur.

4.3.5 Avoidance, Minimization, and/or Mitigation Measures

The measures below would avoid and/or minimize impacts related to cultural resources if Alternative 2 is selected for implementation.

CR-1 Consultation with responsible historic preservation organizations, subject local agencies, and the State Historic Preservation Officer (SHPO) will result in the development of historic covenants or other agreements to protect the historic character and significant features of the National Register of Historic Places (National Register) listed or determined eligible for listing properties. These protective measures will be executed and filed appropriately as the properties are sold and new owners are identified. Agreements to protect historical resources will be enforceable by way of third-party monitoring by a non-profit organization. Any potential impacts to cultural resources would be avoided under these protective measures, which will be held in perpetuity.

CR-2 The California Department of Transportation (Caltrans) will provide a one-time monetary payment, a stewardship fee, to ensure that the qualified organization will have the financial support for the continued

monitoring of the historic covenants or other protective measures as agreed.

4.3.6 Level of Significance After Mitigation

No mitigation is required for the proposed action because the historical resources listed in Table 4.8 will be sold with protective covenants, and the majority of historical resources listed are protected by local jurisdiction preservation ordinances. Therefore, by incorporating Measures CR-1 and CR-2, any impacts related to cultural resources are anticipated to be less than significant.

4.4 Hazardous Waste/Materials

4.4.1 Regulatory Requirements

Hazardous materials including hazardous substances and wastes are regulated by many State and federal laws. Statutes govern the generation, treatment, storage, and disposal of hazardous materials, substances, and waste, and also the investigation and mitigation of waste releases, air and water quality, human health, and land use.

The primary federal laws regulating hazardous wastes/materials are the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) and the Resource Conservation and Recovery Act of 1976 (RCRA). The purpose of CERCLA, often referred to as “Superfund,” is to identify and clean up abandoned contaminated sites so that public health and welfare are not compromised. The RCRA provides for “cradle to grave” regulation of hazardous waste generated by operating entities. Other federal laws include:

- Community Environmental Response Facilitation Act of 1992 (CERFA)
- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Occupational Safety and Health Act (OSHA)
- Atomic Energy Act
- Toxic Substances Control Act (TSCA)
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

In addition to the acts listed above, EO 12088, Federal Compliance with Pollution Control Standards, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved. Because the proposed action does not involve federal funding or approval from any

federal agencies, it is not required to comply with EO 12088. Nevertheless, Caltrans remains committed to the intent of EO 12088.

California regulates hazardous materials, waste, and substances under the authority of the California Health and Safety Code and is also authorized by the federal government to implement RCRA in the State. California law also addresses specific handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning of hazardous waste. The Porter-Cologne Water Quality Control Act also restricts disposal of wastes and requires cleanup of wastes that are below hazardous waste concentrations but could impact ground and surface water quality. California regulations that address waste management and prevention and cleanup of contamination include Title 22 Division 4.5 Environmental Health Standards for the Management of Hazardous Waste, Title 23 Waters, and Title 27 Environmental Protection.

Public health and safety are key issues when addressing hazardous materials that may affect human health and the environment. Proper management and disposal of hazardous material is vital if it is found and/or is disturbed during the proposed sale.

4.4.2 Existing Conditions

The information in this section is based on the hazardous waste assessments prepared for the proposed action. Three hazardous waste assessments were conducted for the Alternative 2 to identify, to the extent practical, contaminated and potentially contaminated areas and hazardous waste problems within the Caltrans right-of-way. The hazardous waste assessments were prepared in three groups: vacant properties (February 2014 and October 2014), residential properties (February 2014 and November 2014), and commercial properties (February 2015).

Caltrans Office of Environmental Engineering (OEE) performed an on-site reconnaissance, reviewed the Regional Water Quality Control Board (RWQCB) Database of Environmental Sites website (GeoTracker), Historic Aerials, available information from appraisal reports from Caltrans Office of Right of Way, Environmental Data Resources (EDR) Report, and records obtained from the City of Los Angeles and the City of Pasadena to complete the three assessments.

4.4.2.1 Residential Parcels

In September and October of 2014, a site reconnaissance was conducted by OEE staff that involved a walking tour of all the parcels. The site reconnaissance revealed that the parcels were single-family homes, multifamily homes/apartments, and schools.

During the site reconnaissance, the presence of pole-mounted transformers (which appear to be in good condition) was observed in the backyards of two parcels (listed in Table 4.9); however, it is unknown whether the transformers contain polychlorinated biphenyls (PCBs).

4.4.2.2 Vacant Parcels

No evidence of release or hazardous waste concern was noted on any of the parcels. The parcels do not pose any hazardous waste concerns.

Table 4.9 Properties Containing Pole-Mounted Transformers

Caltrans Parcel No.	Street Address	City
18517	5514 Allen Street	Los Angeles
3571	3540 Sheffield Avenue	Los Angeles

Source: Caltrans (July 2015).

4.4.2.3 Commercial Parcels

The screening resulted in a final list of four sites that may have an impact and will require further investigation prior to being sold. (Figure 4-4 shows the locations of these four sites.) These four sites are currently leased and are subject to the Roberti Act. The four sites will be offered to the current tenant at fair market value. If not purchased, they can be sold pursuant to the Streets and Highways Code Section 118.6, which allows properties to be offered by auction, sealed or continuous bid to the public, or by sale or exchange to public agencies. The four sites included in the final screening are listed in the tabulation below:

Subject Property No.	Facility	Caltrans Parcel No.	Street Address
1	Grifols Biologicals	14135	5565 Valley Boulevard, Los Angeles
2	MBA Tech Inc.	18497	5600 Alhambra Avenue, Los Angeles
3	Norchem Inc.	3008 & 3003	5649 Alhambra Avenue, Los Angeles
4	Recycling Center	61314	5601 Valley Boulevard, Los Angeles

Source: Caltrans (July 2015).

Caltrans = California Department of Transportation

Excess parcels may not be offered for sale until the District Hazardous Waste Branch Coordinator has provided a Hazardous Materials Disclosure Document allowing sale of the parcel. The disclosure document will certify one of the following three conditions:

1. The parcel is clear of hazardous materials and may be offered for sale; or

This page intentionally left blank

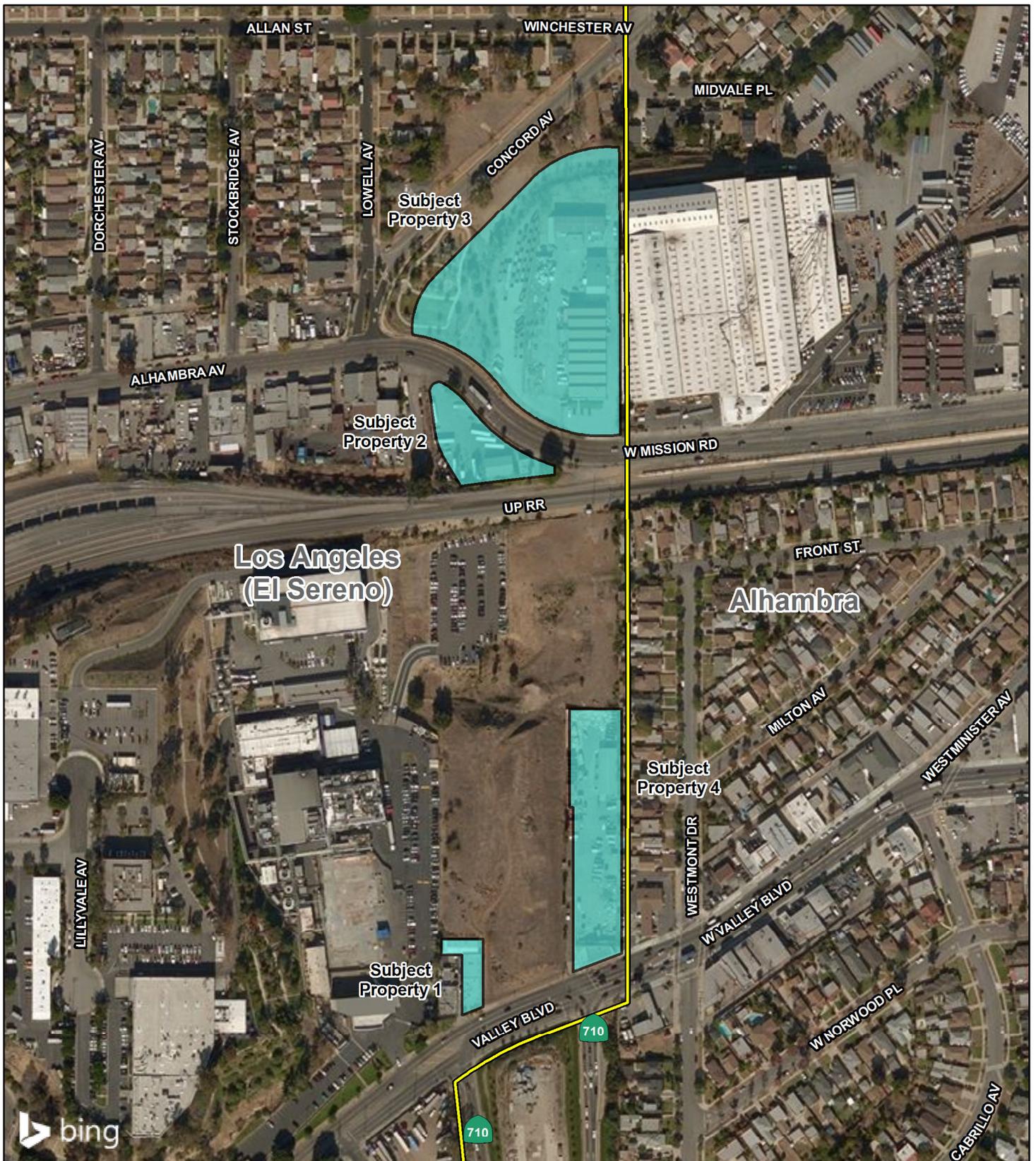
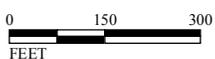


FIGURE 4-4

LEGEND

- Subject Properties
- City Boundary



SOURCE: CalTrans (2015); Bing Maps (2013)
 E:\CDT1502\GIS\HazWaste.mxd (8/8/2016)

This page intentionally left blank

2. That hazardous materials exist on the property, but the property may be offered for sale with appropriate and full information disclosure regarding the nature and extent of the contamination; or
3. That hazardous materials exist/may exist on the property and further investigation or remediation is required, and that the disclosure document is an attachment to an excess land hold request.

The OEE has determined the present category and hold category as 2D Environmental Hold for Subject Property 1 and Subject Property 4. Present category is the inventory type of the property. The hold category is the reason for the State to hold onto the property. 2D Environmental Hold is described as a parcel being held for environmental compliance or for mitigation purposes. The inventory categories¹ are as follows:

- 1 – Disposable Category
 - 1A – Available for immediate sale
- 2 – Hold Category
 - 2A – Engineering Hold
 - 2B – Public Agency Hold
 - 2C – Administrative/Legal Hold
 - 2D – Environmental Hold
- 3 – Entry Category
 - 3A – New excess land pending immediate clearance or pending temporary hold category assignment

Subject Property 1

Subject Property 1 is located at 5565 Valley Boulevard in Los Angeles. City record search indicates that the parcel, 14135, was used as a machine screw factory in 1953. The parcel is currently occupied by Grifols Biological, a global healthcare company, and is being used as an office space and research laboratory. Therefore, the OEE has determined the present category and hold category as 2D Environmental Hold.

Subject Property 2

Subject Property 2 is located at 5600 Alhambra Avenue in Los Angeles. Caltrans right-of-way records show there were two pumps and two underground storage tanks

¹ Caltrans Right of Way Manual, Chapter 16.

(USTs) (gasoline and diesel) on this parcel, 18497, in 1970. No record exists indicating the removal of any of the USTs. EDR records show a leak in a UST was detected and stopped in 1986; no record exists regarding whether the case was closed or not. This parcel is currently being utilized as a vehicle repair facility and has extensive staining on pavement and floor.

A Site Investigation (SI) was conducted for this subject property in 2015 by Santec Consulting Services Inc. The purpose and the objective of an SI is to evaluate the potential release of Chemicals of Concern (COC) associated with current and historical activities (i.e., petroleum hydrocarbons, heavy metals, volatile organic compounds [VOCs], semi-volatile organic compounds [SVOCs], and polychlorinated biphenyls [PCBs]), and to make recommendations for addressing impacts encountered during the SI.

This SI consisted of sampling 20 soil borings and 18 temporary soil vapor monitoring points in different locations throughout the entire parcel (Figure 4-5). Soil borings ranged in depth from approximately 5-feet (ft) below ground surface (bgs) to depths up to 35 ft bgs. Eighteen (18) soil vapor samples were collected from 17 locations at depths from approximately 5 ft bgs to 15 ft bgs. Based on the field findings and laboratory results, presented in the SI report dated February 22, 2016, chemicals of concern (COC) were reported at concentrations below their respective regulatory screening levels in soils samples, with the exception of arsenic, lead, total petroleum hydrocarbon diesel range (TPH-D), and total petroleum hydrocarbon oil range (TPH-O) at some locations. Based on an Initial Site Assessment (ISA) dated June 8, 2015, this parcel is located within the United States Environmental Protection Agency's (EPA) San Gabriel Valley Area 3 Superfund Site where groundwater is contaminated by off-site sources. However, Caltrans is not a Potential Responsible Party for this Superfund Site in relation to this parcel. Therefore, the OEE has determined that this parcel may be sold with full information disclosure.

Subject Property 3 (Parcel Nos. 3003 and 3008)

Parcel No. 3003, is currently occupied by three tenants; Norchem, Inc.; Heritage Disposal; and the City of Los Angeles. Subject Property 3 has no street address. A SI was conducted for the entire subject property in 2015. This SI consisted of sampling 24 soil borings and 23 temporary soil vapor monitoring points in different locations throughout the parcel (Figure 4-6). Soil borings ranged in depth from approximately 5 ft bgs to 15 ft bgs. Based on field findings and laboratory results,

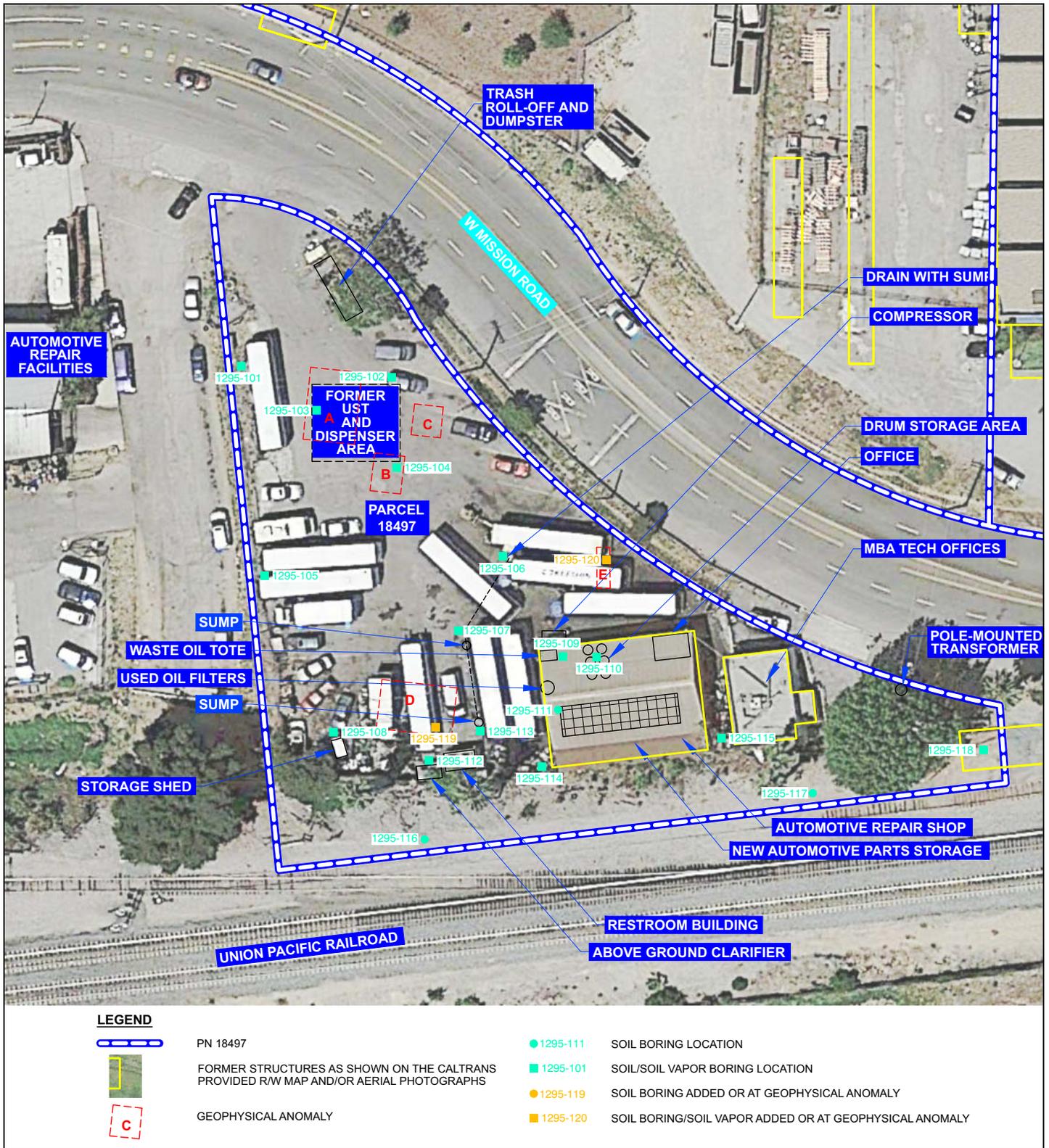
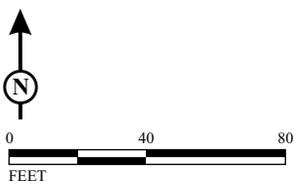


FIGURE 4-5

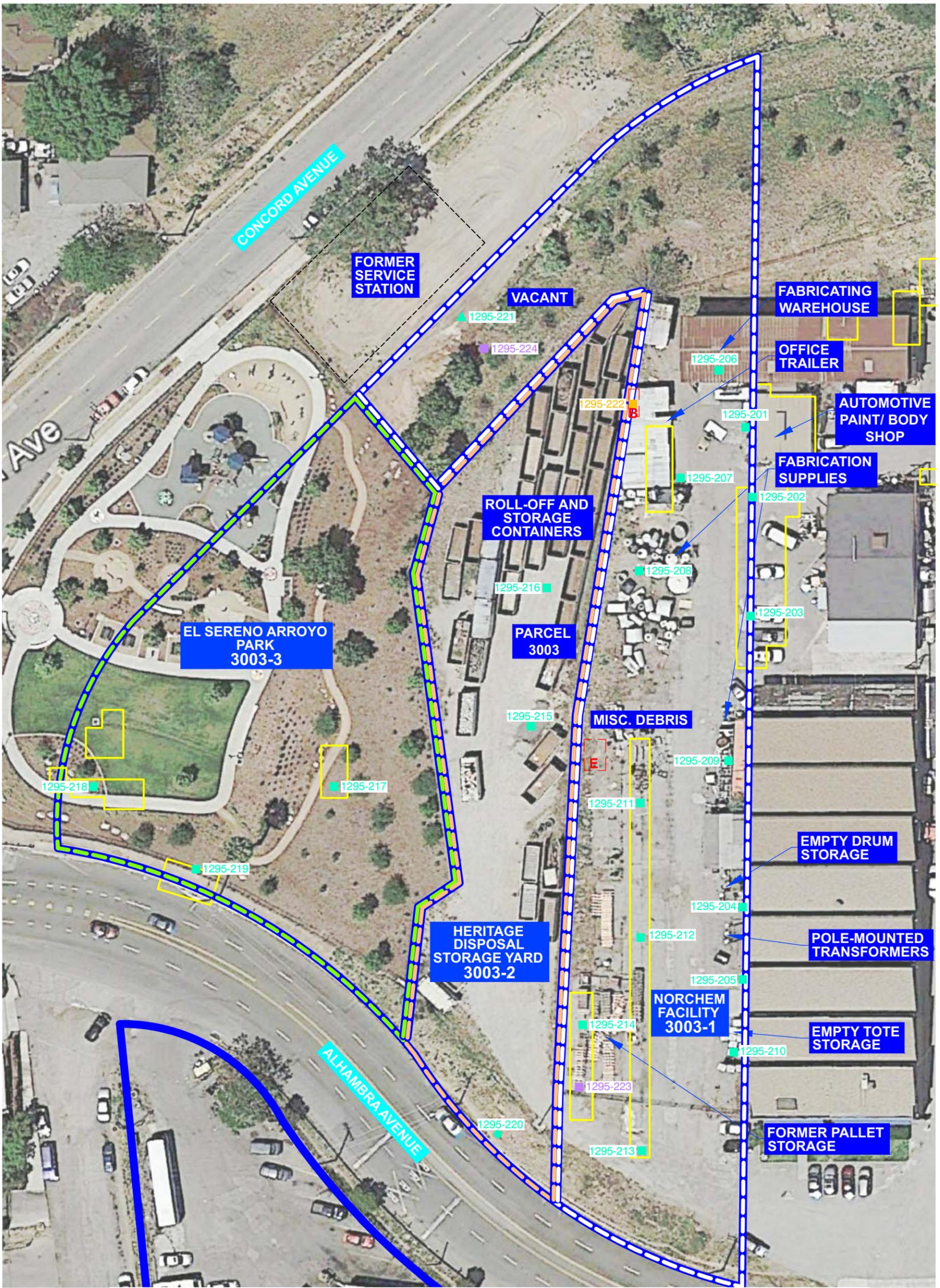


SOURCE: Stantec (12/3/2015)

F:\CDT1502\G\Boring_Loc_Map_Parcel-18497.cdr (8/3/2016)

SR 710 Surplus Property Sale
Parcel No. 18497 Boring Locations

This page intentionally left blank

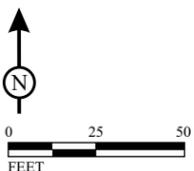


LEGEND

-  SUB-PARCEL 3003-1 (NorChem)
-  SUB-PARCEL 3003-2 (HERITAGE DISPOSAL)
-  SUB-PARCEL 3003-3 (EL SERENO ARROYO PARK)
-  FORMER STRUCTURES AS SHOWN ON THE CALTRANS PROVIDED R/W MAP AND/OR AERIAL PHOTOGRAPHS

-  GEOPHYSICAL ANOMALY
-  1295-220 SOIL BORING LOCATION
-  1295-201 SOIL/SOIL VAPOR BORING LOCATION
-  1295-221 SOIL VAPOR BORING LOCATION
-  1295-222 SOIL BORING/SOIL VAPOR ADDED OR AT GEOPHYSICAL ANOMALY
-  1295-224 SOIL BORING LOCATION ADDED DUE TO ONSITE OBSERVATION

FIGURE 4-6



SOURCE: Stantec (12/3/2015)

I:\CDT1502\G\Boring_Loc_Map_Parcel-3003.cdr (8/3/2016)

This page intentionally left blank

presented in the SI Report dated February 22, 2016, COC exist, which are mostly below regulatory screening levels, with the exception of arsenic, lead, total petroleum hydrocarbon diesel range (TPH-D), and Aerially Deposited Lead (ADL). ADL exists along Alhambra Avenue in shallow soil (less than 3 feet), which needs to be evaluated further if disposal is required in the future.

Parcel No. 3008 is located at 5649 Alhambra Avenue in Los Angeles and is occupied by Norchem, Inc. A SI was conducted for the entire subject property in 2015. This SI consisted of sampling 21 soil borings and 22 temporary soil vapor monitoring points in different locations throughout the parcel (Figure 4-7). Soil borings ranged in depth from approximately 5 ft bgs to 15 ft bgs. Based on the report prepared by Stantec dated February 22, 2016, COC exist, which are mostly below regulatory screening levels. Aerially Deposited Lead (ADL) exists along Alhambra Avenue in shallow soil (<1-foot depth) which would need to be evaluated further if disposal was required in the future.

Based on the ISA dated June 8, 2015, Parcel Nos. 3003 and 3008 are located within EPA's San Gabriel Valley Area 3 Superfund Site where groundwater is contaminated by off-site sources. However, Caltrans is not a Potential Responsible Party for this Superfund Site in relation to these parcels. Therefore, the OEE has determined that Parcel Nos. 3003 and 3008 may be sold with full information disclosure.

Subject Property 4

The Recycling Center (Subject Property 4) is located at 5601 Valley Boulevard in Los Angeles. During site reconnaissance, extensive staining was observed on the ground. This parcel, 61314, was formerly used as an auto dismantling yard with a gas pump and UST. However, no other information regarding removal of the UST is available.

Per the EDR report, this parcel is listed in various databases. Therefore, the OEE has determined the present category and hold category as 2D Environmental Hold.

This page intentionally left blank

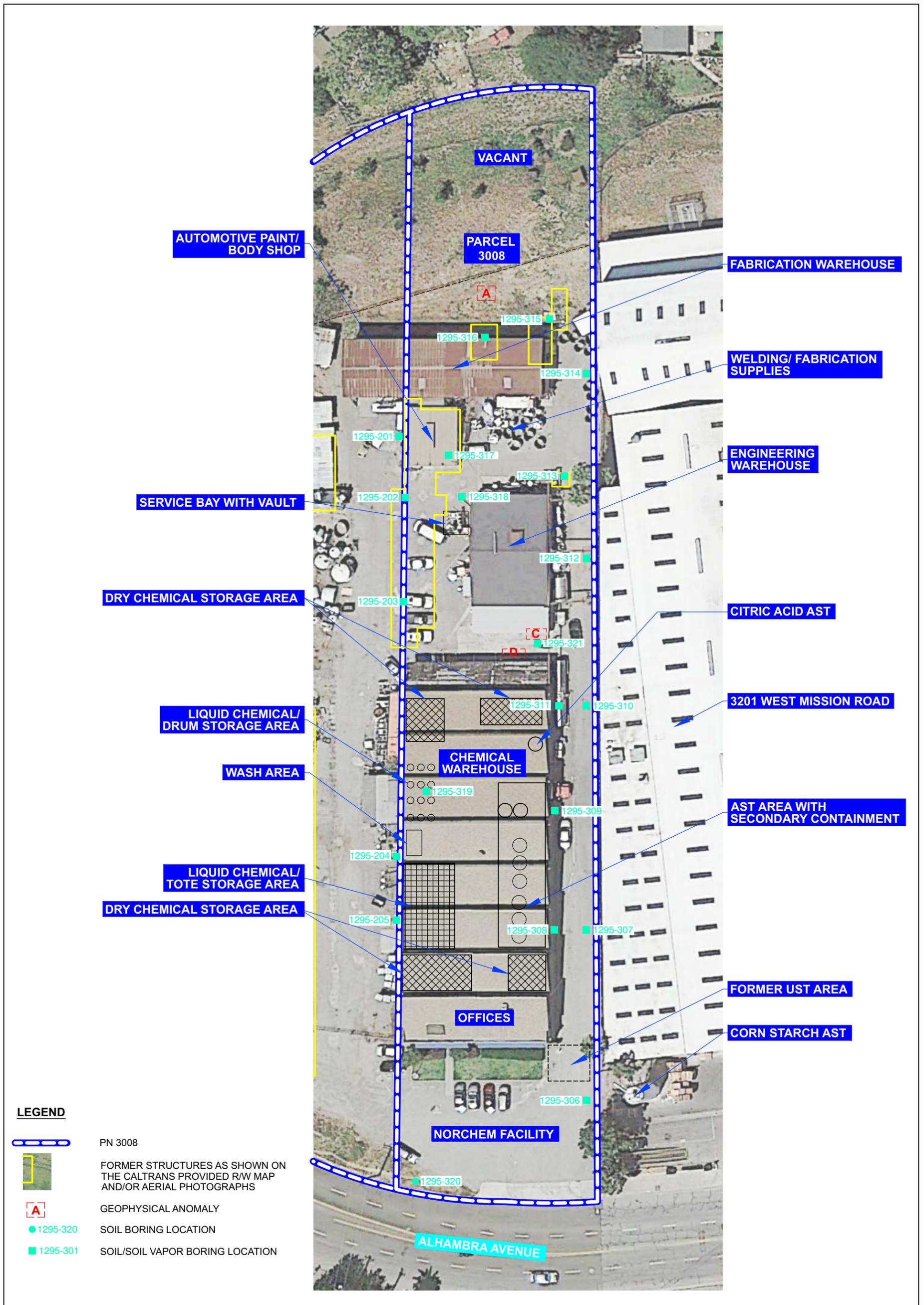
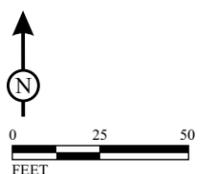


FIGURE 4-7



SOURCE: Stantec (12/3/2015)

I:\CDT1502\G\Boring_Loc_Map_Parcel-3008.cdr (8/3/2016)

SR 710 Surplus Property Sale
Parcel No. 3008 Boring Locations

This page intentionally left blank

4.4.3 Significance Criteria

Criteria for determining the significance of impacts related to hazards or hazardous materials are based on the CEQA Guidelines, Appendix G – Environmental Checklist. Impacts related to hazards or hazardous materials would be considered significant if they were to:

- **HHM-A:** Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- **HHM-B:** Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- **HHM-C:** Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- **HHM-D:** Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65952.5 and, as a result, would it create a significant hazard to the public or the environment.
- **HHM-E:** For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- **HHM-F:** For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- **HHM-G:** Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- **HHM-H:** Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

4.4.4 Impacts

4.4.4.1 Alternative 1 – No Action (No Sale) Alternative

Under Alternative 1, no sale of any property would occur. There would be no chance of encountering any potentially hazardous material. There will be no impacts (for all significance criteria impacts HHM-A through HHM-H) associated with hazardous waste or materials under Alternative 1.

4.4.4.2 Alternative 2 – Action Alternative

Variations A and B

No variations of Alternative 2 are considered to have significant impacts related to HHM-A, HHM-B, HHM-C, HHM-E, HHM-G, and HHM-H, since they do not propose any ground disturbance. However, Subject Property 2 is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65952.5 (HHM-D).

Based on the general age of all of the surplus properties (residential and commercial), it is likely that asbestos-containing materials and lead-based paint may be present within the painted surfaces of the buildings. In addition, other common items are present in the buildings, such as fluorescent lighting, electrical switches, heating/cooling equipment, and thermostats that can contain hazardous waste materials, which may pose a health risk if not handled and disposed of properly.

4.4.5 Avoidance, Minimization, and/or Mitigation Measures

The measures below would avoid, minimize, and/or mitigate impacts related to hazardous materials/waste potentially encountered during the Action Alternatives.

HW-1 A qualified contractor will conduct Initial Site Assessment (ISA) investigations at Parcel Nos. 14135 and 61314 prior to their being sold. Further testing (Phase II Environmental Site Assessment) may be required based on the findings of the ISA, but the parcels will be held until further investigation and testing can be completed and, if necessary, remediation/mitigation can occur.

HW-2 Each buyer will receive a pamphlet entitled “Protect Your Family From Lead In Your Home” and be required to sign a Disclosure of Information on Lead-Based Paint and Lead-Based Paint Hazards Form.

4.4.6 Level of Significance After Mitigation

Neither Subject Property 1 nor Subject Property 4 will be available for sale until further investigation and testing can be completed and, if necessary, remediation can occur. By incorporating Measures HW-1 and HW-2, any impacts related to hazardous materials are anticipated to be less than significant.

Chapter 5 Other Topical CEQA Issues

5.1 Greenhouse Gas Emission and Climate Change

Climate change refers to long-term changes in temperature, precipitation, wind patterns, and other elements of the earth's climate system. An ever-increasing body of scientific research attributes these climatological changes to greenhouse gas (GHG) emissions, particularly those generated from the production and use of fossil fuels.

While climate change has been a concern for several decades, the establishment of the Intergovernmental Panel on Climate Change (IPCC) by the United Nations and World Meteorological Organization in 1988 has led to increased efforts devoted to GHG emissions reduction and climate change research and policy. These efforts are primarily concerned with the emissions of GHGs generated by human activity, including carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), tetrafluoromethane, hexafluoroethane, sulfur hexafluoride (SF₆), fluoroform (HFC-23), s,s,s,2-tetrafluoroethane (HFC-134a), and difluoroethane (HFC-152a).

In the United States, the main source of GHG emissions is electricity generation, followed by transportation. In California, however, transportation sources (including passenger cars, light-duty trucks, other trucks, buses, and motorcycles) make up the largest source of GHG-emitting sources. The dominant GHG emitted is CO₂, mostly from fossil fuel combustion.

There are typically two terms used when discussing the impacts of climate change: "Greenhouse Gas Mitigation" and "Adaptation." "Greenhouse Gas Mitigation" is a term for reducing GHG emissions to reduce or "mitigate" the impacts of climate change. "Adaptation" refers to the effort of planning for and adapting to impacts resulting from climate change (such as adjusting transportation design standards to withstand more intense storms and higher sea levels).¹

There are four primary strategies for reducing GHG emissions from transportation sources: (1) improving the transportation system and operational efficiencies, (2) reducing travel activity, (3) transitioning to lower GHG-emitting fuels, and

¹ http://climatechange.transportation.org/ghg_mitigation/.

(4) improving vehicle technologies/efficiency. To be most effective, all four strategies should be pursued cooperatively.¹

5.1.1 Regulatory Setting

With the passage of several pieces of legislation, including State Senate and Assembly Bills and Executive Orders, California launched an innovative and proactive approach to dealing with GHG emissions and climate change.

- **Assembly Bill (AB) 1493, Pavley, Vehicular Emissions: Greenhouse Gases, 2002:** This bill requires the California Air Resources Board (ARB) to develop and implement regulations to reduce automobile and light truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light trucks beginning with the 2009 model year.
- **Executive Order (EO) S-3-05 (June 1, 2005):** The goal of EO S-3-05 is to reduce California's GHG emissions to: (1) year 2000 levels by 2010, (2) year 1990 levels by 2020, and (3) 80 percent below the year 1990 levels by 2050. In 2006, this goal was further reinforced with the passage of AB 32.
- **AB 32, Núñez and Pavley, The Global Warming Solutions Act of 2006:** AB 32 sets the same overall GHG emissions reduction goals as outlined in EO S-3-05, while further mandating that ARB create a scoping plan and implement rules to achieve "real, quantifiable, cost-effective reductions of greenhouse gases."
- **EO S-20-06 (October 18, 2006):** This order establishes the responsibilities and roles of the Secretary of the California Environmental Protection Agency (Cal/EPA) and State agencies with regard to climate change.
- **EO S-01-07 (January 18, 2007):** This order set forth the low carbon fuel standard for California. Under EO S-01-07, the carbon intensity of California's transportation fuels is to be reduced by at least 10 percent by the year 2020.
- **SB 97, Chapter 185, 2007, Greenhouse Gas Emissions:** Required the Governor's Office of Planning and Research (OPR) to develop recommended amendments to the California Environmental Quality Act (CEQA) Guidelines for addressing GHG emissions. The amendments became effective on March 18, 2010.
- **SB 375, Chapter 728, 2008, Sustainable Communities and Climate Protection:** This bill requires the ARB to set regional emissions reduction targets

¹ http://www.fhwa.dot.gov/environment/climate_change/mitigation/.

from passenger vehicles. The Metropolitan Planning Organization (MPO) for each region must then develop a “Sustainable Communities Strategy” (SCS) that integrates transportation, land use, and housing policies to plan for the achievement of the emissions target for their region.

- **SB 391, Chapter 585, 2009, California Transportation Plan:** This bill requires the State’s long-range transportation plan to meet California’s climate change goals under AB 32.

An individual project does not generate enough GHG emissions to significantly influence global climate change. Rather, global climate change is a cumulative impact. This means that a project may contribute to a potential impact through its incremental change in emissions when combined with the contributions of all other sources of GHG.¹ In assessing cumulative impacts, it must be determined if a project’s incremental effect is “cumulatively considerable” (CEQA Guidelines Sections 15064(h)(1) and 15130). To make this determination, the incremental impacts of the project must be compared with the effects of past, current, and probable future projects. To gather sufficient information on a global scale of all past, current, and future projects to make this determination is a difficult, if not impossible, task.

5.1.2 CEQA Conclusion

The proposed action is only to sell properties deemed surplus and is not a transportation project. The action does not include construction activities or the operation of a transportation facility, and is therefore not anticipated to have a cumulatively considerable effect on GHG emission or climate change.

¹ This approach is supported by the AEP: *Recommendations by the Association of Environmental Professionals on How to Analyze GHG Emissions and Global Climate Change in CEQA Documents* (March 5, 2007), as well as the South Coast Air Quality Management District (Chapter 6: The CEQA Guide, April 2011) and the US Forest Service (Climate Change Considerations in Project-Level NEPA Analysis, July 13, 2009).

5.2 Cumulative Impacts

5.2.1 Regulatory Requirements

Cumulative impacts are those that result from past, present, and reasonably foreseeable future actions, combined with the potential impacts of this project. A cumulative effect assessment looks at the collective impacts posed by individual land use plans and projects. Cumulative impacts can result from individually minor, but collectively substantial impacts taking place over a period of time.

Cumulative impacts to resources in the study area may result from residential, commercial, industrial, and highway development, as well as from agricultural development and the conversion to more intensive types of agricultural cultivation. These land use activities can degrade habitat and species diversity through consequences such as displacement and fragmentation of habitats and populations, alteration of hydrology, contamination, erosion, sedimentation, disruption of migration corridors, changes in water quality, and introduction or promotion of predators. They can also contribute to potential community impacts identified for the project, such as changes in community character, traffic patterns, housing availability, and employment.

CEQA Guidelines, Section 15130, describes when a cumulative impact analysis is warranted and what elements are necessary for an adequate discussion of cumulative impacts. The definition of cumulative impacts, under CEQA, can be found in Section 15355 of the CEQA Guidelines.

5.2.2 Methodology

This section is based on the *Cumulative Impact Assessment* (Caltrans 2015). The cumulative impacts analysis for the State Route 710 (SR-710) Surplus Property Sales was developed by following the eight-step process set forth in the *Guidance for Preparers of Cumulative Impact Analysis* (Caltrans 2005), posted on the California Department of Transportation (Caltrans) Standard Environmental Reference (SER) website (www.dot.ca.gov/ser/cumulative_guidance/downloads/Approach_and_Guidance.pdf). The eight-step process is as follows:

1. Identify the resources to consider in the cumulative impacts analysis by gathering input from knowledgeable individuals and reliable information sources. This process is initiated during project scoping and continues throughout the National Environmental Policy Act/California Environmental Quality Act (NEPA/CEQA) analysis.

2. Define the geographic boundary or Resource Study Area (RSA) for each resource to be addressed in the cumulative impacts analysis.
3. Describe the current health and historical context of each resource.
4. Identify the direct and indirect impacts of the proposed project that might contribute to a cumulative impact on the identified resources.
5. Identify a set of other current and reasonably foreseeable future actions or projects and their associated environmental impacts to include in the cumulative impacts analysis.
6. Assess cumulative impacts.
7. Report the results of the cumulative impacts analysis.
8. Assess the need for mitigation and/or recommendations for actions by other agencies to address a cumulative impact.

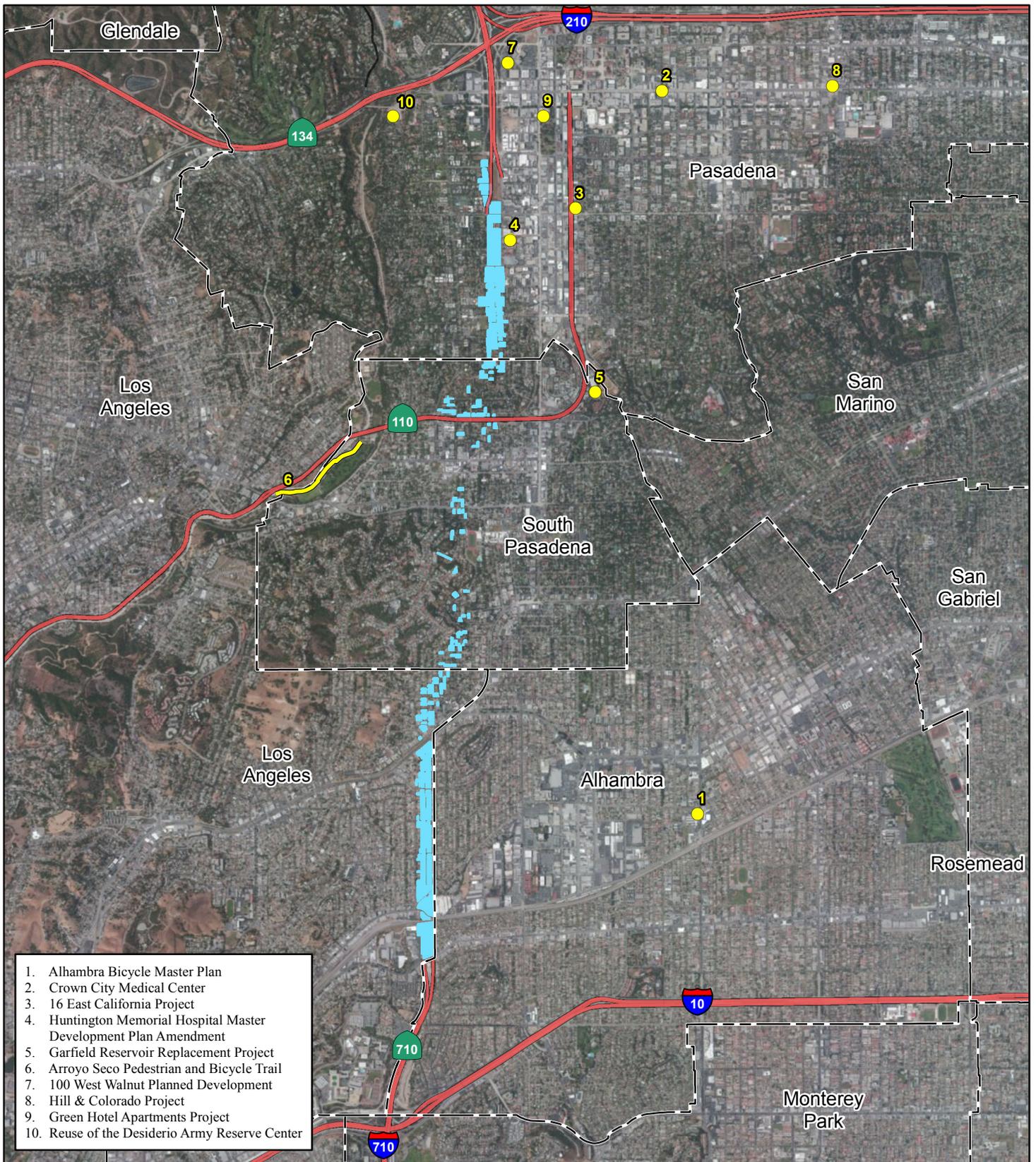
As specified in the Caltrans guidance, if the proposed project would not result in a direct or indirect impact to a resource, it would not contribute to a cumulative impact on that resource. This cumulative impacts analysis includes resources that would be substantially impacted by the proposed project, as well as resources that are currently in poor or declining health or that would be at risk even if proposed project impacts were not substantial.

The reasonably foreseeable actions used in this cumulative impacts analysis were based on information obtained from the websites of the cities within the study area and the County of Los Angeles, which identified approved and pending developments proposed in the proximity of the study area. These files were cross-checked against files maintained by the State of California, Office of Planning and Research. Information on future transportation projects was provided by Caltrans, the Southern California Association of Governments (SCAG), the Los Angeles County Metropolitan Transportation Authority (Metro), the California High Speed Rail Authority, the Federal Railroad Administration, and the Alameda Corridor-East Construction Authority. The reasonably foreseeable actions are listed in Table 5.1 and shown on Figures 5-1 and 5-2. Table 5.1 may not be an exhaustive list of every planned project within the study area cities/communities, but it contains projects that have the possibility of contributing to a cumulative effect (due to size, location, etc.).

5.2.3 Resources Excluded from Cumulative Impact Analysis

The proposed Action involves the sale of properties deemed excess and in accordance with existing law. Based on the scope of the proposed Action, the affected environment of the study area, and the technical studies prepared for the Surplus

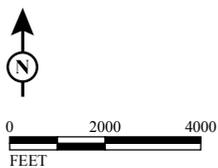
This page intentionally left blank



LEGEND

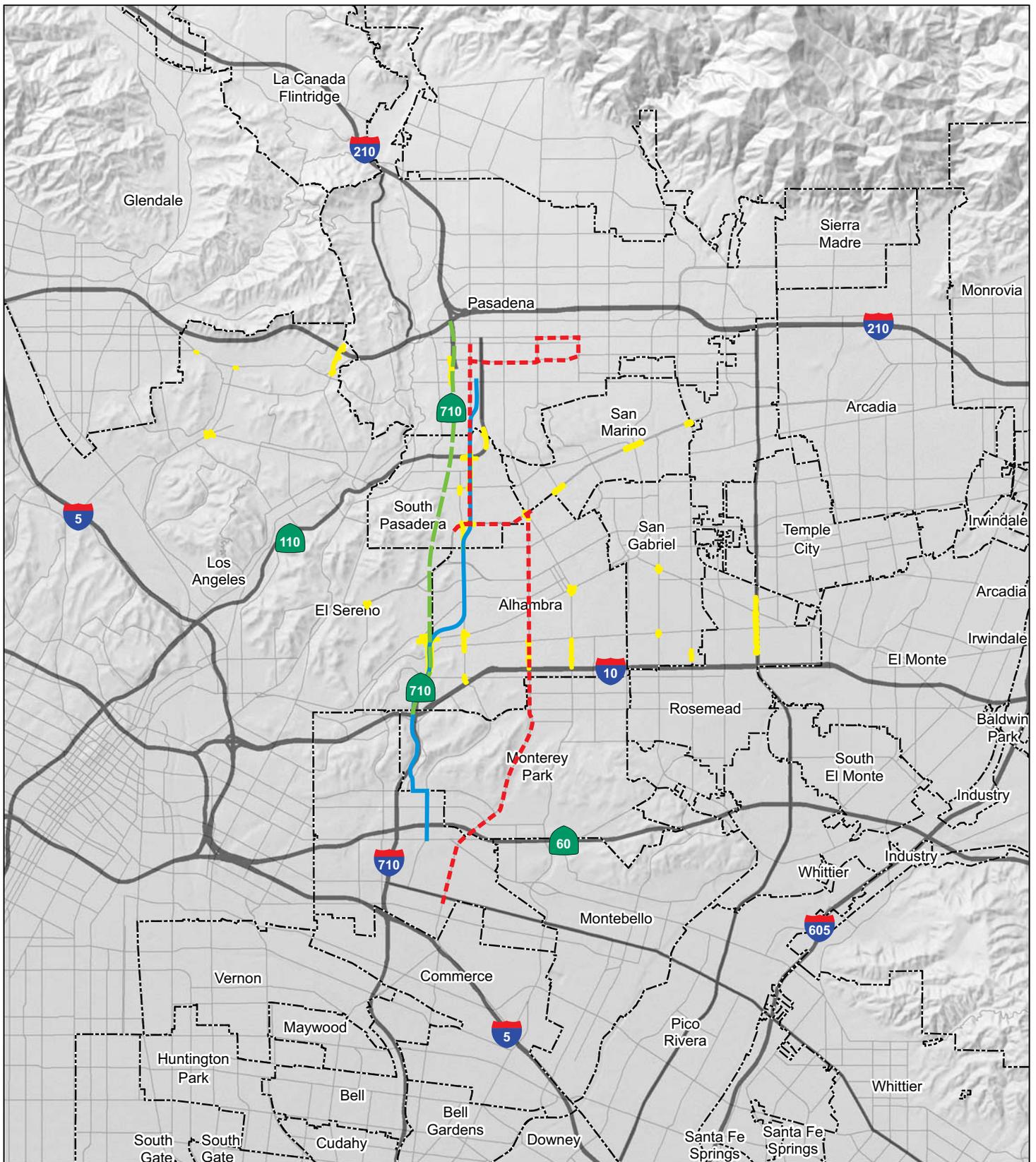
- Cumulative Projects
- Potential Surplus Properties
- Cities within Project Area

FIGURE 5-1



SR 710 Surplus Property Sale
 Cumulative Projects

This page intentionally left blank



LEGEND

- - - BRT Alternative
- TSM/TDM Alternative
- LRT Alternative
- - - Freeway Tunnel Alternative



SOURCE: ESRI (2008); SCAG (2010)

I:\CDT1502\G\CumulativeProjects-SR 710 (5/19/15)

FIGURE 5-2

This page intentionally left blank

Table 5.1 Projects Included in Cumulative Impacts Analysis

Project ID No.	Project Title	Lead Agency	Project Description	Project Status	Relevant Cumulative Environmental Factors
N/A (Build Alternatives shown on Figure 5-2)	SR-710 North Study	Caltrans	Caltrans, in cooperation with Metro, is examining options to improve mobility and relieve congestion in the area between SR-2, I-5, I-10, I-210, and I-605 in East/Northeast Los Angeles and the San Gabriel Valley. Five multimodal alternatives are being evaluated, including the no build, TSM/TDM, bus rapid transit, light rail transit, and a freeway tunnel.	DEIR/DEIS issued March 2015	Land use, community character/cohesion, relocation, traffic/transportation, natural communities, animal species, wetlands, threatened/endangered species, visual/aesthetics, floodplains, water quality, hazardous waste, geology/soils, air quality, construction impacts
1	Alhambra Bicycle Master Plan	City of Alhambra	Development of a comprehensive network of bike paths, lanes, and routes while integrating this system with homes, jobs, public transit, recreational resources, and adjacent communities. The project would also implement a bicycle parking policy. Source: Alhambra Bicycle Master Plan (Feb 2013).	Draft master plan published Feb. 2013. Prioritized series of project implemented over next 10 years.	Land use, traffic
2	Crown City Medical Center	City of Pasadena	The project allows for the development of a 112,252 sf, five-story medical office and retail building over a six-level parking garage (one level at-grade and five subterranean levels). Excavation for the parking garage would be to an approximate depth of approximately 56 ft and would require a total of 80,000 cy of export. The project will provide 476 parking spaces. Access to and from the parking structure would be from Converse Alley. Source: CEQAnet query, SCH No. 2011091041.	DEIR issued Nov. 2012.	Traffic/transportation, visual, paleontological resources
3	16 East California Project	City of Pasadena	The proposed project includes demolition of the three existing on-site structures totaling approximately 12,635 sf and surface parking areas in order to develop a four-story, 113,200 gross square feet of office building with 255 parking spaces provided within a two-level subterranean parking garage. Source: http://www.ceqanet.ca.gov/DocDescription.asp?DocPK=630765 .	Information regarding the start of construction is not available.	Environmental document unavailable, but impacts to visual and paleontological resources expected to occur
4	Huntington Memorial Hospital Master Development Plan Amendment	City of Pasadena	Huntington Memorial Hospital, located at 100 West California Boulevard, is a 29.11 ac site. The hospital is proposing to amend its master development plan with rehabilitation and development that will occur in phases over the next 20 years, as well as reconfiguration of the plan's boundary area. Source: http://www.ceqanet.ca.gov/DocDescription.asp?DocPK=654053 .	An IS was prepared in July 2011. An EIR is in preparation.	Land use, traffic, visual, paleontological resources, air quality
5	Garfield Reservoir Replacement Project	City of South Pasadena	The City of South Pasadena proposes the construction of a replacement for the Garfield Reservoir. The Garfield Reservoir is a 6.25-million-gallon reservoir constructed of concrete and covered by a metal roof supported on a wood frame. A replacement reservoir is needed to bring the Garfield Reservoir up to current seismic standards. The proposed project includes demolition of the existing Garfield Reservoir and pump station and construction of two replacement reservoirs, a pump station, an inlet/outlet vault, a rechlorination room, and a water distribution support yard on the project site. The proposed project also includes the replacement of a storm drain within an existing easement through the adjacent Blair High School athletic field. Source: http://www.ceqanet.ca.gov/NODdescription.asp?DocPK=676082 , accessed May 28, 2014.	An MND was completed in November 2011 and an NOD issued in October 2013. Work has commenced	None
6	Arroyo Seco Pedestrian and Bicycle Trail	City of South Pasadena	Construction of a pedestrian and bicycle trail (approximately 0.65 mi), which will be an extension of the existing Arroyo Seco Bike Trail located in the City of Los Angeles. The proposed trail is planned to begin at the western limit of the City of South Pasadena, run north through the City's Nature Park and the Arroyo Seco Golf Course, continue north along Lohman Lane, and terminate at Stoney Drive. The project will require the removal of a 20 ft wide section from the driving range of the golf course, the replacement of driving range facilities, and an encroachment into the golf course parking lot. Proposed trail elements include landscaping, irrigation, benches, trash cans, drinking fountains, educational displays, information and directional signage to amenities and other trails, and an enhanced pedestrian and bicycle entry gate at golf course entrance. Source: http://www.ceqanet.ca.gov/DocDescription.asp?DocPK=674681 , accessed May 28, 2014.	An MND was completed in September 2013. Construction is anticipated to begin in March 2016 and be completed by October 2016.	None
7	100 West Walnut Planned Development	City of Pasadena	The proposed 100 West Walnut development is a mixed-use development that would complement the existing office buildings on the site with the proposed development of 620,000 sf of office uses, of which up to 30,000 sf could be used for ancillary retail uses, 10,000 sf of restaurant uses, and 475 residential units. The proposed development would be located on the paved parking area on the site, and parking for this project would be provided via a multi-level subterranean parking structure offering a minimum of 3,760 parking spaces, which includes replacement spaces lost with the removal of the existing surface parking areas at the project site. All proposed development would occur within the portion of the project site located north of Holly Street. Source: http://www.ceqanet.ca.gov/DocDescription.asp?DocPK=672184 , accessed May 28 2014.	An NOP and IS were prepared in July 2013. Construction is anticipated to begin in 2016 and be completed by 2020.	Aesthetic/visual, air quality, archaeological/historic, drainage/absorption, traffic/circulation, land use, utilities/emergency services

Table 5.1 Projects Included in Cumulative Impacts Analysis

Project ID No.	Project Title	Lead Agency	Project Description	Project Status	Relevant Cumulative Environmental Factors
8	Hill and Colorado Project	City of Pasadena	The proposed project involves the establishment of a Planned Development District for two sites on opposite sides of Colorado Boulevard in the City of Pasadena. The proposed project involves the establishment of a Planned Development District that delineates development standards relative to building setbacks, heights, form, mass, scale, and other design considerations for future development at the site. Based on the proposed development standards, which can be considered to constitute a "development envelope," the project proponent proposes a potential development concept that would provide approximately 438,685 sf of building space at the project site for uses currently allowed under the existing zoning, specifically hotel development and commercial/retail uses. Source: http://www.ceqanet.ca.gov/DocDescription.asp?DocPK=675165 , accessed May 28, 2014.	An NOP and IS were prepared in October 2013.	Aesthetic/visual, air quality, archaeological/historic, drainage/absorption, traffic/circulation, land use, utilities/emergency services
9	Green Hotel Apartments Project	City of Pasadena	The proposed project involves construction of a six-story mixed-use building with 64 residential units and 5,000 sf of commercial space on an existing surface parking lot at 86 South Fair Oaks Avenue in Pasadena. The project site is 32,362 sf and the proposed mixed-use building would be 76,980 sf in size and 75 ft high. Source: http://www.ceqanet.ca.gov/DocDescription.asp?DocPK=677874 , accessed May 28, 2014.	A DEIR was circulated in January 2014. Construction is anticipated to begin in August 2014 and be completed by December 2016.	Traffic/circulation, land use
10	Reuse of the Desiderio Army Reserve Center	City of Pasadena	The 5.1 ac site was formerly the grounds and recreation area of the Vista del Arroyo Hotel and Resort Complex, built in 1903. Proposed project includes two primary components: 3.87 ac city park and nine single-family detached bungalow homes in a courtyard formation. The southeast portion of the site would be developed into nine bungalow homes by Habitat for Humanity, encompassing a total of 1.29 ac.	NOP published Sep. 2013 and DEIR circulated April 2014. Construction anticipated completed by 2016.	Archaeological/historical, transportation

Source: Caltrans (July 2015).

- ac = acres
- Caltrans = California Department of Transportation
- cy = cubic yards
- DEIR = Draft Environmental Impact Report
- DEIS = Draft Environmental Impact Statement
- EIR = Environmental Impact Report
- ft = feet
- I-10 = Interstate 10
- I-210 = Interstate 210
- I-5 = Interstate 5
- I-605 = Interstate 605
- IS = Initial Study
- Metro = Los Angeles County Metropolitan Transportation Authority
- mi = miles
- MND = Mitigated Negative Declaration
- NOD = Notice of Determination
- NOP = Notice of Preparation
- sf = square feet
- SR-2 = State Route 2
- SR-710 = State Route 710
- TDM = Transportation Demand Management
- TSM = Transportation System Management

Property Sales, the following resources would not be substantially impacted by the Surplus Property Sales and are not at risk:

- **Aesthetics:** The proposed action does not propose a physical change to the environment. While the sale of the properties removes them from State right-of-way, the sale in itself does not remove the properties from or otherwise alter the viewshed. There are no scenic highways or any eligible scenic highways within the project limits. Therefore, there are no recognized environmental concerns related to aesthetics for any of the SR-710 Surplus Property Sales alternatives or variations.
- **Agriculture and Forestry:** There are no timberlands or prime, unique, or soils of local significance for farmlands within the study area. Therefore, there are no recognized environmental concerns related to farmlands and timberlands for any of the SR-710 Surplus Property Sales alternatives or variations.
- **Air Quality:** The proposed action will not affect air quality.
- **Biological Resources:** There will be no impacts to biological resources due to the limits of the action, scope of work, and urbanized environmental setting. No construction activities are proposed to take place as a result of the proposed sale. Therefore, there are no recognized environmental concerns related to biological resources for any of the SR-710 Surplus Property Sales alternatives or variations.
- **Energy:** The proposed action does not involve construction activities nor would it result in a facility that would directly impact energy use. Therefore, there are no recognized environment concerns related to energy use for any of the SR-710 Surplus Property Sales alternatives or variations.
- **Geology/Soils:** The proposed action does not involve any excavation or construction activities. Therefore, there are no recognized environmental concerns related to geology and/or soils for any of the SR-710 Surplus Property Sales alternatives or variations.
- **GHG Emissions:** As the action does not propose construction work, there are no recognized environmental concerns related to GHG emissions or climate change for any of the SR-710 Surplus Property Sales alternatives or variations.
- **Hydrology/Water Quality:** The proposed action will not conduct any work within any floodplain nor will it generate additional non-porous flat surfaces.
- **Mineral Resources:** The proposed action does not involve any excavation or construction and therefore will not have an impact on mineral resources.
- **Noise:** The proposed action is not considered a Type I project as defined by 23 Code of Federal Regulations (CFR) 772. It is not expected to raise traffic noise

or cause a substantial noise increase. Therefore, there are no recognized environmental concerns related to noise for any of the SR-710 Surplus Property Sales alternatives or variations.

- **Paleontological Resources:** The proposed action does not involve any excavation or construction activities and therefore will not have an effect on paleontological resources.
- **Public Services:** The proposed action only involves the sale of surplus properties and will not impact emergency services or require temporary street closures/detours.
- **Recreation:** The proposed action will not impact recreational facilities, increase the use of existing recreational facilities, or require the construction/expansion of recreational facilities.
- **Transportation and Traffic/Bicycle and Pedestrian Facilities:** The scope of the proposed action is to sell surplus properties; therefore, streets, sidewalks, and bicycle facilities are not affected as part of this action.
- **Utilities/Service Systems:** The proposed action will not disturb any utilities, nor will it require the construction of additional utilities or service systems.

5.2.4 Resources Evaluated for Cumulative Impact Analysis

Given the level of effect identified in the technical studies, potential cumulative effects related to the following resources and environmental topics may result from implementation of the Build Alternatives. Each of these topics is discussed below. Reasonably foreseeable actions for the study area are listed in Table 5.1. For each environmental topic, relevant projects are listed along with the project identification number shown on Figure 5-1. Figure 5-2 shows the SR-710 North Study project location. The source documents for the environmental impact information for these major projects are provided in Table 5.1. For each environmental topic listed below, the RSA is described.

The cumulative impact analysis considered the effects of the action on each environmental topic and then considered with other projects listed in Table 5.1 might contribute to cumulative effects on that environmental parameter. It is acknowledged that the majority of the projects in Table 5.1 may result in some level of effects for most of the environmental parameters discussed in this chapter, although many of those effects would be expected to be minor or relatively limited. Nonetheless, the cumulative impacts analysis considers the additive effect of impacts of all projects in an area on a specific environmental parameter. The analyses in the following sections considered the effects of the projects in Table 5.1 that would potentially contribute

substantially to cumulative effects for the identified parameter. Those analyses do not exclude potential effects of the other projects, but rather highlight those projects with the greatest potential to contribute to cumulative effects.

5.2.4.1 Land Use

Information in this section is based on the *Community Impact Assessment* (CIA; LSA 2015) prepared for the SR-710 Surplus Property Sales.

Resource Study Area

As land use impacts are relative to the area in which the proposed sale properties are located, the RSA for the purposes of this analysis is the study area. The study area is comprised of the 2010 United States census tracts containing the surplus properties (Census Tracts 2016.02, 2015.01, 2011.20, 4807.04, 4807.03, 4806, 4639, and 4637) within the Cities of Los Angeles (i.e., the El Sereno neighborhood), Pasadena, and South Pasadena, and generally following the previously adopted Meridian Route between the northern terminus of Interstate 710 (I-710) and State Route 134 (SR-134).

Health and Historical Context

El Sereno

The neighborhood of El Sereno is part of the City of Los Angeles. As of 2010, the City of Los Angeles had 3,792,621 residents. El Sereno is primarily a built-out neighborhood. While the Northeast Los Angeles Community Plan contains policies to promote quality development within El Sereno, the neighborhood has very little vacant land available for new development. Any future development would likely involve infill development or the recycling of land currently occupied by existing homes or businesses. Approximately 63 percent of the surplus properties in El Sereno are currently developed for residential uses, while approximately 14 percent of the surplus properties in the neighborhood are currently vacant.

Pasadena

The City of Pasadena is primarily a built-out community. While the City's General Plan Land Use Element (2004) contains policies to promote quality development within the City, the City has very little vacant land available for new development. Any future development would likely involve infill development or the recycling of land currently occupied by existing homes or businesses. Approximately 73 percent of the surplus properties in the City of Pasadena are currently developed for

residential uses, while approximately 21 percent of the surplus properties within the City are currently vacant.

South Pasadena

The City of South Pasadena is primarily a built-out community. While the City's General Plan Land Use Element (1998) contains policies to promote quality development within the City, the City has very little vacant land available for new development. Any future development would likely involve infill development or the recycling of land currently occupied by existing homes or businesses. Approximately 92 percent of the surplus properties in South Pasadena are currently developed for residential uses, while approximately 8 percent of the surplus properties within the City are currently vacant.

Project Impacts

Alternative 1: No Action (No Sale) Alternative

Alternative 1 would not result in the sale of any of the surplus properties. If the surplus properties are not sold, no changes to existing land uses on the surplus properties or existing land use patterns in the areas surrounding the surplus properties would occur because the surplus properties would continue to be owned by Caltrans. Alternative 1 is not expected to result in changes to land use throughout the study area and would not result in any incompatibilities with existing land uses or land use inconsistencies with any local jurisdictions' General or Specific Plans. However, Alternative 1 would be inconsistent with specific individual policies in the City of Pasadena and City of South Pasadena General Plans and in the City of South Pasadena's Mission Street Specific Plan that support the sale of the surplus properties for affordable housing and other purposes.

Alternative 2: Action Alternative

Variations A and B

All variations of Alternative 2 would result in the sale of the surplus properties; however, the transfer of ownership title from Caltrans to a different owner is not expected to alter or otherwise affect the existing land uses on the surplus properties or existing land use patterns in the areas surrounding the surplus properties. No variation of Alternative 2 would modify any of the land use plans or zoning ordinances that control land use decisions and development patterns on or surrounding the surplus properties. Any future development on the surplus properties sold by Caltrans would be undertaken in accordance with the applicable General Plan land use and zoning designations in effect at the time that

such development is proposed. Any proposed changes to the General Plan or zoning designations applicable to the surplus properties would be subject to a separate environmental review process undertaken by the city in which the affected properties are located. Because no variation of Alternative 2 is expected to result in changes to land uses throughout the study area, neither variation would result in any incompatibilities with existing land uses or land use inconsistencies with any local jurisdictions' General Plans or Specific Plans. All variations of Alternative 2 would be consistent with specific individual policies in the City of Pasadena and City of South Pasadena General Plans and in the City of South Pasadena's Mission Street Specific Plan that support the sale of the surplus properties for affordable housing and other purposes.

Reasonably Foreseeable Actions

Reasonably foreseeable actions would occur in the areas that are planned for development or redevelopment. These reasonably foreseeable actions are listed in Table 5.1 and shown on Figures 5-1 and 5-2.

Cumulative Impact

As neither of the proposed alternatives is expected to result in changes in land use designations, the excess property sale, in combination with the cumulative projects in the area, would not contribute to a cumulative impact related to land use. Alternative 1 has the potential, combined with other reasonably foreseeable actions in the study area, to contribute to cumulatively considerable impacts with regards to consistency with local plans and programs.

Avoidance, Minimization, and/or Mitigation

Alternative 1: No Action (No Sale) Alternative

To resolve inconsistencies with specific individual policies in the City of Pasadena and City of South Pasadena General Plans and in the City of South Pasadena's Mission Street Specific Plan that support the sale of the surplus properties for affordable housing and other purposes, Caltrans could request that the Cities of Pasadena and South Pasadena amend their respective General Plans and that the City of South Pasadena amend its Mission Street Specific Plan. The implementation of this mitigation measure would ensure that the project does not contribute to cumulative impacts with regards to consistencies with regional and general plans.

Alternative 2: Action Alternative

Variations A and B

No mitigation is required for the proposed action.

5.2.4.2 Growth

The information in this section is based on the CIA (LSA 2015) prepared for the SR-710 Surplus Property Sales.

Resource Study Area

Since growth occurs on a regional level, the SCAG region is used as the RSA for the purpose of this analysis.

Health and Historical Context

At the regional level, much of Los Angeles County is built out and urbanized, especially within the study area. However, SCAG anticipates population, housing, and employment growth to continue to occur for the foreseeable future. At the local level, SCAG anticipates the Cities of Los Angeles, Pasadena, and South Pasadena to experience increases in population of 4.5 percent, 2.1 percent, and 0.8 percent, respectively, by 2020. Lower percentages typically reflect cities and communities that are largely built out with relatively little land available for development, including residential uses.

Increases in the number of households are also forecast at the local level and regionally. The SCAG region projects a 9.1 percent increase in households by 2020. The Cities of Los Angeles, Pasadena, and South Pasadena are projected to experience an increase of households of 8.9 percent, 1.7 percent, and 1.5 percent, respectively. Similar to the population forecasts, the lower forecasts of households typically reflect cities and communities that are largely built out with relatively little land available for development. Higher percentages typically represent either greater availability of land for development or are reflective of small actual increases in the number of households in an area where the total number of households are relatively small.

Similarly, increases in employment are forecast both regionally and at the local level. SCAG forecasts a 14.5 percent increase in employment in the region by 2020, and the cities of Los Angeles, Pasadena, and South Pasadena are projected to increase their employment figures by 12.1 percent, 8.7 percent, and 6 percent, respectively. Similar to the population and household forecasts, lower employment forecasts typically reflect cities and communities that are largely built out with relatively little land available for development.

Project Impacts

Alternative 1: No Action (No Sale) Alternative

Under Alternative 1, Caltrans would retain ownership of the surplus parcels and the status quo would be maintained. Alternative 1 would not remove any obstacles to growth, result in the need to expand public services, encourage or facilitate economic development that could result in other activities that could significantly affect the environment, or involve a precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment. Therefore, it is reasonable to conclude that Alternative 1 would not result in growth-related effects.

Alternative 2: Action Alternative

Variations A and B

All variations of Alternative 2 would remove a potential obstacle to growth (Caltrans ownership of developable parcels); however, neither variations would result in the need to expand public services, encourage or facilitate economic development that could result in other activities that could significantly affect the environment, or involve a precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment. Therefore, it would be reasonable to conclude that neither variations of Alternative 2 would result in growth-related effects.

Reasonably Foreseeable Actions

Reasonably foreseeable actions would occur in the areas that are planned for development or redevelopment. These reasonably foreseeable actions are listed in Table 5.1 and shown on Figures 5-1 and 5-2.

Cumulative Impact

As described above, the action alternative and/or the cumulative projects listed in Table 5.1 are expected to accommodate existing, approved, and planned growth in the area, but they are not expected to influence the amount, timing, or location of growth in the area. Therefore, there would not be a cumulatively considerable growth-inducing effect.

Avoidance, Minimization and/or Mitigation Measures

No mitigation is required for the proposed action.

5.2.4.3 Community Factors

Information in this section is based on the CIA (LSA 2015) prepared for the SR-710 Surplus Property Sales, and the *Final Relocation Impact Report* (FRIR; Caltrans 2016) also prepared for the SR-710 Surplus Property Sales.

Resource Study Area

The study area is used as the RSA for the purpose of this analysis. The study area is comprised of the 2010 United States census tracts containing the surplus properties (Census Tracts 2016.02, 2015.01, 2011.20, 4807.04, 4807.03, 4806, 4639, and 4637) within the Cities of Los Angeles (i.e., the El Sereno neighborhood), Pasadena, and South Pasadena, and generally following the previously adopted Meridian Route between the northern terminus of I-710 and SR-134.

Health and Historical Context

Los Angeles (El Sereno)

The neighborhood of El Sereno owes much of its existence to the development of rail transportation lines. El Sereno's population rose markedly during World War II and experienced major industrial growth during these years. Many of the families who moved here during these years were Italian-American. Restrictive covenants had prevented Mexican-American families who lived in the adjacent communities of Lincoln Heights and Boyle Heights from purchasing homes in El Sereno. After such restrictions were lifted by a 1948 Supreme Court decision (*Shelley v. Kraemer*), many Mexican-American families moved to El Sereno. The demand for housing after World War II was satisfied by the construction of new neighborhoods in the southern end of El Sereno. El Sereno's largest land use dates only from the late 1950s, when the campus of California State University, Los Angeles, was relocated there from its original site on Vermont Avenue. In 1970, Woodrow Wilson Senior High School moved its campus to the top of Multnomah Street. Soon after it was built, the five-story high school became a major landmark in El Sereno.

At the time of the 2010 Census, on average, 54.6 percent of the population in the three census tracts of the RSA that are within El Sereno were racial minorities (non-white). Black or African Americans comprised, on average, 1.5 percent of the population, American Indians/Native Alaskans comprised, on average, 1.6 percent of the population, Asians comprised, on average, 9.9 percent of the population, Native Hawaiian/Pacific Islanders comprised, on average, 0.1 percent of the population, and 37.5 percent of the population, on average, identified as Some Other Race.

The average percentage of owner-occupied residences in three census tracts within the neighborhood of El Sereno that include potential surplus properties is 45.5 percent.

Pasadena

The City of Pasadena incorporated in 1886. From the real estate boom of the 1880s until the Great Depression, great tourist hotels were developed in the City, and Pasadena became a winter resort for wealthy easterners. In the early 1900s, more grand hotels were built. The City's population grew from 9,117 in 1900 to 30,291 by 1910. The area of the City increased through annexations to the north and east. Some of the best architects settled in Pasadena, which became known for its fine architecture, particularly the Craftsman style that was perfected by Greene and Greene.

Through the end of the 1920s, Pasadena continued to enjoy a reputation as a tourist center and winter resort for the wealthy. The Depression signaled the end of an era for Pasadena, disrupting its tourist economy, which never resumed at its previous level. World War II ushered in a turnabout and set Pasadena on the path to modern industrial growth. The completion in 1940 of the Arroyo Seco Parkway, California's first freeway, provided a fast and direct route from Pasadena to Los Angeles.

In the mid-1940s and early 1950s, new housing tracts were opened in the Linda Vista, San Rafael, Allendale, Hastings Ranch, and Coronet areas to relieve the housing shortage. The early 1960s saw some major companies leave Pasadena due to lack of land for expansion. The 1970s were a period of economic revitalization, primarily under the direction of the Pasadena Redevelopment Agency. With growth and new development came concern for preserving the unique quality of life in Pasadena. An awakened respect for the City's architectural treasures led to the renovation of historic homes and buildings throughout Pasadena. Revitalization of this area occurred throughout the 1980s, culminating at the end of 1992 with the completion of the One Colorado historic block. Pasadena's role as a regional hub was further enhanced by the completion of the Metro Gold Line (which connects the City to downtown Los Angeles) in 2003.

At the time of the 2010 Census, on average, 76.5 percent of the population in the two census tracts of the RSA that are within the City of Pasadena were White, 4.4 percent were Black/African American, 0.3 percent were American Indian/Native Alaskan, 11.7 percent were Asian, 0.1 percent were Native Hawaiian/Pacific Islanders, and

3.2 percent identified as Some Other Race. On average, 23.6 percent of the population in the two census tracts of the RSA that is within the City of Pasadena was classified as a racial minority (non-white). Additionally, on average, 14.5 percent of the populations in these census tracts identified as Hispanic/Latino origin.

The average percentage of owner-occupied residences in the two census tracts within the City of Pasadena that include potential surplus properties is 57.3 percent.

South Pasadena

Few cities in California are better recognized for the quality of their small-town atmospheres and rich legacies of intact late 19th and early 20th century neighborhoods and residences than South Pasadena. The City also has a strong claim to having the oldest and most historic sites in the San Gabriel Valley. The built environment of South Pasadena reflects its rich heritage. Entire neighborhoods of homes built in the Craftsman, Revival, or Art Deco styles of 1900–1939 have survived largely intact and have been enriched with mature landscaping. A handful of homes from the Victorian era are scattered throughout the community. The historic city center and business district around Mission Street and Meridian Avenue have been listed in the National Register of Historic Places. Many of the City’s historic institutional buildings, ranging from religious to civic, continue to play a vital role in town life. South Pasadena is now considered one of the best preserved cities in California, maintaining a small-town quality and humanity in the scale of its buildings, its residential streetscapes, and historic commercial core.

At the time of the 2010 Census, the population of the three census tracts of the RSA that are located within the City of South Pasadena contained, on average, 46.6 percent racial minorities (non-white). This included 3.2 percent Black/African American, 0.5 percent American Indian/Native Alaskan, 30.8 percent Asian, 0.0 percent Native Hawaiian/Pacific Islanders, and 6.1 percent Some Other Race. Additionally, on average, 20.4 percent of the populations in these census tracts identified as Hispanic/Latino origin. The average percentage of owner-occupied residences in the two census tracts within the City of South Pasadena that include potential surplus properties is 41.7 percent.

Approximately 157 of the households currently renting the surplus properties across all jurisdictions are enrolled in the Affordable Rent Program. Therefore, it is reasonable to assume that approximately 50 percent of the households renting the residential surplus properties are low-income households.

Project Impacts

Alternative 1: No Action (No Sale) Alternative

Community Demographics and Character

Under Alternative 1, existing conditions would be maintained. No impacts to established communities and/or neighborhoods would occur. However, high levels of home ownership is one of the factors generally related to a high level of community cohesion, and so it may be reasonable to assume that under Alternative 1, the level of community cohesion may in fact be lower than it would if the excess properties were sold.

Relocation and Real Property Impacts

Under Alternative 1, Caltrans would retain ownership of the surplus properties. None of the existing leases on the residential surplus properties would be terminated and all current tenants would be able to remain in their current homes. Because no residential tenants would be displaced, replacement housing would not be required.

Environmental Justice¹

Under Alternative 1, Caltrans would retain ownership of the surplus properties. None of the existing leases on the residential surplus properties would be terminated and all current tenants would be permitted to remain in their current homes. Because no residential tenants would be displaced from the surplus properties, Alternative 1 would not result in any disruptions to the existing tenant population, including both low-income and non-low-income populations. The Affordable Rent Program would continue to protect qualified low-income

¹ The proposed action does not involve federal funding or require approval from any federal agencies, and therefore is not subject to the requirements of NEPA and not required to comply with the provisions of EO 12898, which directs federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on minority and low-income populations to the greatest extent practical and permitted by law. Nevertheless, Caltrans remains committed to the intent of EO 12898, and given the action's relationship to affordable housing, has decided to examine the potential for the proposed action to result in disproportionately high and adverse effects on environmental justice populations.

households living in the residential surplus properties from large rent increases. Alternative 1 would maintain the status quo on the surplus properties; however, it would not make any of the surplus properties available for sale to existing tenants, including both low-income and non-low-income populations. Therefore, Alternative 1 would not result in any adverse impacts that are appreciably more severe or greater in magnitude on environmental justice populations than the adverse effects experienced by non-environmental justice populations.

Alternative 2: Action Alternative

Variations A and B

Community Demographics and Character

Under all variations of Alternative 2, the surplus properties would be offered to current tenants and/or occupant given the first right of refusal, and the sales price would be affordable for those under a certain household income level or at appraised fair market value at tenant's request. Multifamily properties would first be offered to housing-related public and private entities at a reasonable price, with the stipulation that current tenants be given the first right of occupancy. If the proposed multifamily residence sale would result in displacements, it would be at the decision of the occupant.

The Affordable Sales Program (ASP) regulations process is happening concurrently with this Environmental Impact Report (EIR) process and is striving to ensure that those tenants who desire purchasing their homes will be afforded every possible opportunity to do so, thereby limiting the possibility of changing the community demographics and character. Additionally, higher rates of homeownership generally positively correlate with a higher level of community cohesion, benefiting the communities and neighborhoods in which the surplus properties are located.

Relocation and Real Property Impacts

It is assumed that 148 of the single-family properties will be sold at fair market value to persons other than their current occupants. Nonresidential displacements are not anticipated. Replacement neighborhoods are within 15 miles (mi) of all potential displacements associated with this action, and there are several neighborhoods and cities in that area with similar amenities to that of the displacement area. There are special relocation problems associated with this action.

Regulations to implement the ASP give priority to current occupants meeting eligibility criteria. Occupants who become homebuyers will not be displaced. To increase the potential for occupants to obtain financing to purchase, Caltrans is working with the California Housing Finance Agency to make more financing products available to prospective buyers than are readily available in the general lending market. In anticipation of the sales action, homebuyer workshops have also been provided to interested tenants occupying properties that may be sold as surplus. Occupants who do not purchase will be provided advisory assistance to find and relocate to comparable housing, and Caltrans will seek assistance from agencies such as the United States Department of Housing and Urban Development (HUD) to find affordable housing. Relocation benefits and payments will be made pursuant to the Roberti Act.

This action will not significantly impact the local housing stock for the community because there are no plans for demolition or conversion to nonresidential use of the existing housing stock associated with this action. Under Variation A Options 1 and 2, market availability is expected to remain adequate through the time of displacement. While Los Angeles County can be considered a scarce housing market, the life of the sale under Variation A is projected for a full 5 years. Thus, the replacement market will not be flooded with an unmanageable number of displacees in need of replacement housing at once. Under Variation B Options 1 and 2, securing replacement housing could pose a challenge if all 148 households are displaced simultaneously.

Environmental Justice¹

Implementation of Alternative 2 would result in the sale of 398 residential surplus properties. Approximately 100 of these residential surplus properties are anticipated to be sold at affordable prices to current tenants of low or moderate income, and approximately 50 of the residential surplus properties are anticipated to be sold to housing-related public or private entities.

Although the sale of the residential surplus properties under Alternative 2 would result in the termination of the Affordable Rent Program, it is estimated that approximately two-thirds of the 157 low-income households currently participating in the Affordable Rent Program would be able to purchase their current rental units at affordable prices, while some of the other low-income households currently participating in the Affordable Rent Program may be able to remain in their homes if they are purchased by housing-related public or private entities. Therefore, it is assumed that the majority of the low-income population living in the residential surplus properties would be able to remain in their current homes.

For comparison purposes, it is estimated that approximately 62 (or approximately 40 percent) of the 159 households that are not currently participating in the Affordable Rent Program, and which are assumed to be above-moderate-income households, would be able to purchase their current homes. Thus, it is estimated that implementation of both variations of Alternative 2 could result in the displacement of a smaller percentage of low-income households than non-low-income households from the surplus

¹ The proposed action does not involve federal funding or require approval from any federal agencies, and therefore is not subject to the requirements of NEPA and not required to comply with the provisions of EO 12898, which directs federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on minority and low-income populations to the greatest extent practical and permitted by law. Nevertheless, Caltrans remains committed to the intent of EO 12898, and given the action's relationship to affordable housing, has decided to examine the potential for the proposed action to result in disproportionately high and adverse effects on environmental justice populations.

properties. A sufficient number of residential replacement properties exist to accommodate the relocation of all tenants (both low-income and non-low-income populations) displaced as a result of the sale of the surplus properties in accordance with Alternative 2.

Because neither variation of Alternative 2 is expected to result in the displacement of a disproportionate number of low-income residents or result in significant, unavoidable impacts on low-income (or non-low-income) populations, it is reasonable to conclude that neither variation of Alternative 2 would result in adverse impacts that are appreciably more severe or greater in magnitude on environmental justice populations than the adverse effects experienced by non-environmental justice populations.

Reasonably Foreseeable Actions

Reasonably foreseeable actions would occur in the areas that are planned for development or redevelopment. These reasonably foreseeable actions are listed in Table 5.1 and shown on Figures 5-1 and 5-2.

Additionally, given the nature of this action, resale of the surplus properties once they are transferred from State ownership is also reasonably foreseeable, as they will once again become part of the real estate market.

Cumulative Impact

Community Demographics and Character

Because the action is not anticipated to adversely affect community character and cohesion, the SR-710 Surplus Property Sales will not contribute to a cumulative impact on community character and cohesion.

As the action is intended to increase the stock of affordable housing, promote homeownership, and give current Caltrans tenants every available opportunity to purchase their residences, and it is reasonably foreseeable that the subject properties will be resold at some point in time, potential impacts to community character and cohesion could occur if these properties are purchased with the intention to “flip” the property by purchasing it at an affordable price and re-selling it at fair market value and thereby profiting. Measures are written into the ASP regulations that limit the net appreciation purchasers can recover from the properties if they purchase the property at an affordable price for the first 5 years of ownership. The proportionate share of net appreciation that the owner receives is increased by 20 percent after each

year of ownership. After a full 5 years, owners will receive 100 percent of net appreciation upon resale of the property. These measures are included to ensure that the ASP achieves its purpose of fostering homeownership for persons of low or moderate income to the highest degree possible, while also not impeding the ability of said persons to gain equity.

Relocation and Real Property Impacts

The action could result in a cumulatively considerable impact with respect to relocations. Although it is anticipated that neighborhoods would be able to absorb displacees in the greater replacement area, it is assumed that the simultaneous sale of all properties (Variation B Options 1 and 2) would pose a more difficult market with respect to finding and securing comparable replacement housing. However, there are no public projects in the area that will displace other families/households or make additional housing available concurrent with the proposed action. Additionally, in order to administer the relocation effort, Caltrans District 7 Right-of-Way staff workload is anticipated to add the necessary agents for successful delivery, and Caltrans will seek assistance from agencies such as HUD to find affordable housing. Therefore, cumulatively considerable impacts under Variation B Options 1 and 2 will be minimized to the greatest extent possible.

Environmental Justice

Because it is not anticipated that the proposed action will result in adverse impacts that are appreciably more severe or greater in magnitude on environmental justice populations than non-environmental justice populations, the SR-710 Surplus Property Sales would not contribute to a cumulative impact related to environmental justice.

Avoidance, Minimization, and/or Mitigation Measures

None necessary.

5.2.4.4 Cultural Resources

The information in this section is based on the two-volume *Historic Resource Compliance Report* (HRCR; Caltrans 2015) prepared for the SR-710 Surplus Property Sales.

Resource Study Area

The Project Area Limits (PAL) used in the HRCR is used as the RSA for the purposes of this analysis. The PAL for this project identifies the potential surplus properties

subject to this analysis and is defined by the legal property boundary for each parcel to be sold.

Health and Historical Context

The RSA is densely developed with a wide range of primarily historic period (pre-1971) property types, including single- and multifamily residences and commercial businesses. The PAL is characterized by predominantly historic period (pre-1971) suburban development that encompasses most common property types, including detached single-family residences, bungalow courts, apartment buildings, and commercial buildings. Similarly, there is a wide variety of architectural styles represented by resources evaluated in the PAL. Residential and commercial architecture followed prevailing trends, but also reflected the realities of a working class population and the gradual development of forms appropriate to the ideals of the California lifestyle, transitioning from the Victorian styles of the late 1800s to Revival and Craftsman styles in the 1910s and 1920s and the Art Deco and Minimal Traditional styles in the 1930s and early 1940s. These were followed by the California Ranch style, which gained huge popularity during the post-World War II period and by Modern, Contemporary, and Brutalist styles in the 1950s and 1960s.

With such rich histories and a vast number of buildings that date to the historic period (pre-1971), as might be expected, several of the cities and the communities in the PAL have active preservation programs. As a result, a number of areas have been identified and/or formally evaluated for historic district potential. A historic district is considered an individual resource, and the buildings and features that make up the district are either contributing or non-contributing elements of the district. There are seven (7) National Register of Historic Places (National Register) listed or determined eligible for listing historic districts in the PAL.

There are 113 historical resources located within the PAL. Of these 113 historical resources, there are 75 properties in the City of Pasadena, 13 properties in the City of South Pasadena, and 10 properties in the City of Los Angeles that are listed in or determined eligible for listing in the National Register. The historical resources include contributors to 7 historic districts as well as 24 properties that are individually eligible for the National Register. In addition, 15 historical resources in the City of South Pasadena are not eligible for the National Register but are considered historical resources for the purposes of CEQA. All are currently State-owned properties.

Project Impacts

Alternative 1: No Action (No Sale) Alternative

Under Alternative 1, Caltrans would retain ownership of the surplus parcels. No impact to cultural resources would occur.

Alternative 2: Action Alternative

Variations A and B

Caltrans Professionally Qualified Staff (PQS) has determined that consultation with responsible historic preservation organizations, subject local agencies, and the State Historic Preservation Officer (SHPO) will result in the development of historic covenants or other measures to protect the historic character and features of the 113 historical resources within the PAL. These protective measures will be executed and filed appropriately with the deeds as the properties are sold and new owners are identified. These protective measures will be held in perpetuity.

In the case of the 15 CEQA-only resources located in the City of South Pasadena, a Certified Local Government (CLG), the City of South Pasadena's Municipal Code Section 2.64 (demolition and alteration), and the City Planning Commission, Design Review Board, and Cultural Heritage Commission all have specific responsibilities for reviewing alterations to existing historical resources in their jurisdiction.

Reasonably Foreseeable Actions

Reasonably foreseeable actions would occur in the areas that are planned for development or redevelopment. These reasonably foreseeable actions are listed in Table 5.1 and shown on Figures 5-1 and 5-2.

Additionally, given the nature of this action, resale of the surplus properties once they are transferred from State ownership is also reasonably foreseeable because they will once again become part of the real estate market.

Cumulative Impact

It is possible that other cumulative projects could have an adverse impact on historic properties within the PAL. However, as stated above, with the protective measures in place at the time of the sale, the action would not have an adverse impact on any cultural or historic resource. Therefore, the SR-710 Surplus Property Sales would not contribute to a cumulative impact on historic resources.

Further, the protective measures to be enacted will be held in perpetuity and are unaffected by future sales of the properties. Because of the protective measures as well as local building and municipal codes and the oversight of various historic preservation organizations, it is not anticipated that any future sales of the historic properties will contribute to cumulative impacts on historic resources.

Avoidance, Minimization, and/or Mitigation

None proposed.

5.2.4.5 Hazardous Waste

Information in this section is based on three Memoranda from Caltrans District 7 Office of Environmental Engineering, dated October 23, 2014, November 13, 2014, and February 27, 2015.

Resource Study Area

The RSA for the purpose of this analysis is the study area. The study area is comprised of the 2010 United States census tracts containing the surplus properties (Census Tracts 2016.02, 2015.01, 2011.20, 4807.04, 4807.03, 4806, 4639, and 4637) within the Cities of Los Angeles (i.e., the El Sereno neighborhood), Pasadena, and South Pasadena, and generally following the previously adopted Meridian Route between the northern terminus of I-710 and SR-134.

Health and Historical Context

The properties are adjacent to the Monterey Hills. The Monterey Hills are a northeasterly extension of the Repetto Hills. From the termination of the existing freeway at Valley Boulevard to Huntington Drive, the alignment corridor crosses through Pleistocene Old Alluvium composed of silt, sand, and gravel. Geologic formations comprising the hills are thinly bedded shale and bedded-to-massive sandstone from the Middle Miocene Topanga, and diatomaceous shale and well-bedded siliceous shale from the Upper Miocene Puente. Pleistocene Old Alluvium forms most of the surrounding valleys.

Site reconnaissance and data review were performed for all parcels.

Project Impacts

Alternative 1: No Action (No Sale) Alternative

Under Alternative 1, the properties would remain under State ownership. No impacts related to, or disturbance of, hazardous waste or materials would occur.

Alternative 2: Action Alternative**Variations A and B**

The four sites in Table 5.2 were identified as having hazardous waste concerns that could potentially impact all the Alternative 2 variation options.

Table 5.2 Parcels of Hazardous Waste Concern

No.	Caltrans Parcel No.	Street Address	City
1	14135	5565 Valley Blvd	Los Angeles
2	61314	5601 Valley Blvd	Los Angeles
3	3008 and 3003	5649 Alhambra Ave	Los Angeles
4	18497	5600 Alhambra Ave	Los Angeles

Source: Caltrans (July 2015).

Because these four sites could potentially impact the sale of the potential surplus properties, a further Initial Site Assessment (ISA) investigation of these sites will be necessary prior to any ownership change. Based on the site investigation (SI) report completed on February 22, 2016, and the ISA report completed on June 8, 2015, for Site Nos. 3 and 4, those parcels can be sold with full disclosure.

However, Site Nos. 1 and 2 will be held until further investigation and testing can be completed and, if necessary, remediation can occur.

Reasonably Foreseeable Actions

Reasonably foreseeable actions would occur in the areas that are planned for development or redevelopment. These reasonably foreseeable actions are listed in Table 5.1 and shown on Figures 5-1 and 5-2.

Cumulative Impact

One cumulative project in this region, the SR-710 North Study, has been identified to have a potential hazardous waste impact. However, a Phase II investigation would be conducted for any project with potential excavation/demolition activities prior to any construction activities and would provide appropriate avoidance, minimization, and/or mitigation measures to prevent unnecessary exposure to contaminants during construction activities. Therefore, the sale of the surplus properties, in combination with the cumulative projects in the area, would not contribute to a cumulative impact related to hazardous waste.

Avoidance, Minimization, and/or Mitigation

To avoid, minimize, and/or mitigate for potential impacts related to hazardous waste, an ISA will be conducted for the remaining two sites (Nos. 1 and 2) with identified

hazardous waste concerns, and remediation will occur, if necessary, prior to the properties being sold.

5.3 Sustainability

Sustainability is defined as the preservation or enhancement of the environment, the economy, and social equity (also known as the 3Es) to improve the quality of life by meeting the needs of the present generation without compromising the ability of future generations to meet their own needs. Caltrans applies sustainability principles by making efficient, risk-based, balanced decisions through the use of best practices. Sustainability principles include:

- Protecting the environment and making practical transportation decisions that preserve or improve ecological health and resiliency, while complying with legal mandates.
- Enhancing California's economy through the management and public accountability of transportation asset investments and life-cycle costs to support statewide goals, provide integrated transportation services, and promote economic vitality of local communities.
- Enhancing social equity for all Californians across present and future generations by using best practices that improve and support long-term community livability, health, safety, and well-being.
- Fostering effective partnerships with governmental entities, the public, tribal governments, and stakeholders that are essential to statewide sustainability, and to improve system integration with partners beyond transportation to achieve statewide goals.
- Strategic innovation that adopts new technologies, practices, and research findings, and continually evaluates and refines guidance, tools, policies, and procedures essential to meeting evolving sustainability challenges.

Caltrans embraces and is committed to its role in improving the environment, the economy, and social equity for all Californians, and strives to improve Californians' quality of life without compromising that of future generations. This commitment is met by the application of sustainability principles in the planning, design, construction, operation, and maintenance of California's integrated multimodal transportation system. The State transportation system is developed and maintained in a way that contributes to resiliency in the natural and built environments to improve quality of life, provide access to necessities, and support a vibrant California.

California's statewide sustainability goals strive to benefit natural systems as well as individuals and communities across the State, the nation, and the world. Implementing sustainability principles leads to balanced use and conservation of resources over time, thereby ensuring that supplies are available for the future prosperity of people and the planet.

As transportation needs and priorities change, Caltrans is committed to flexibility and empowering communities to remain healthy and strong. The proposed action would add to the stock of affordable housing in the high-priced Los Angeles County market and help promote homeownership among those who might otherwise be unable to afford it. It would help preserve established neighborhoods and enhance community cohesion by increasing ownership rates in the study area communities, which in turn will increase the vitality of these communities. Commitments will be enacted to protect historic resources that will ensure these resources will be preserved for future generations.

5.4 Determining Significance under CEQA

CEQA requires Caltrans to identify each "significant effect on the environment" resulting from a project as well as ways to mitigate each significant effect. If a project may have a significant effect on any environmental resource, then an EIR must be prepared. Each and every significant effect on the environment must be disclosed in the EIR and mitigated if feasible. In addition, the CEQA Guidelines list a number of mandatory findings of significance, which also require the preparation of an EIR. This section discusses the effects of this project and CEQA significance.

5.4.1 Unavoidable Significant Environmental Effects

The impacts are summarized below.

5.4.1.1 Land Use and Planning

Conflict with Land Use Plans

Alternative 1 would result in inconsistencies with land use designations in General Plans for local jurisdictions. Under Alternative 1, those inconsistencies would exist until the applicable local General Plans are amended to reflect the use of the affected parcels. Caltrans does not have land use planning authority and has no authority to require local jurisdictions to amend their General Plans. Therefore, it will be the decision of the affected local jurisdictions on how and when to address the identified General Plan land use inconsistencies. However, because it is generally desirable that General Plans be consistent with existing conditions, Caltrans will request that the

applicable local jurisdictions amend their General Plans, as specified in Measure LU-1. However, because Caltrans has no authority to require a General Plan amendment, a significant unavoidable impact would remain until the General Plans are amended.

5.4.2 Mitigation Measures for Significant Impacts under CEQA

Table 5.3 lists the mitigation measures that address the impacts on the applicable resources. The complete text of each measure is provided in the appropriate sections of Chapter 4.

Table 5.3 Mitigation Measures for Significant Impacts under CEQA

Mitigation Measure	Alternative 1 (No Sale)	Alternative 2	
		Variation A Options 1 and 2	Variation B Options 1 and 2
Land Use			
LU-1 Alternative 1 would result in inconsistencies with local jurisdictions' General Plans and/or other location land use plans. If Alternative 1 is selected for implementation, the California Department of Transportation (Caltrans) will request applicable local jurisdictions to amend their General Plans and/or other local land use plans to reflect that the surplus properties would not be sold. However, because Caltrans has no authority to require a General Plan amendment, a significant unavoidable impact would remain until the General Plans are amended.	●		
Hazardous Waste			
HW-1 A qualified contractor will conduct Initial Site Assessment (ISA) investigations at Parcel Nos. 14135, and 61314 prior to their being sold. Further testing (Phase II Environmental Site Assessment) may be required based on the findings of the ISA, but the parcels will be held until further investigation and testing can be completed and, if necessary, remediation/mitigation can occur.		●	●

Source: Caltrans (July 2015).

● = Bullets show which alternatives and variations apply to the specific mitigation measure.

CEQA = California Environmental Quality Act

This page intentionally left blank

Chapter 6 References

California Department of Housing and Community Development, State Income Limits for 2014, <http://www.hcd.ca.gov/hpd/hrc/rep/state/inc2k14.pdf>, accessed on February 28, 2015.

California Department of Transportation (Caltrans), District 7 and the Los Angeles County Metropolitan Transportation Authority. *SR-710 North Study Draft Environmental Impact Report/Environmental Impact Statement and Draft Section 4(f) De Minimis Findings*, Volume 1, March 2015, http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/SR%20710%20No.%20Study%20Draft%20EIR_EIS%20Vol%20I%20Rpt.pdf, accessed July 2, 2015.

California Department of Transportation (Caltrans), District 7 and the Los Angeles County Metropolitan Transportation Authority. *SR-710 North Study Relocation Impact Report*, October 2014, http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/Relocation%20Impact%20Report/SR%20710%20Relocation%20Impact%20Report.pdf, accessed July 2, 2015.

California Department of Transportation (Caltrans), District 7 and the Los Angeles County Metropolitan Transportation Authority. *SR-710 North Study Alternatives Analysis Report*, December 2012, http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/docs/Final_AA_report_2013-01-14_Low_Res_ES_Only.pdf, accessed July 2, 2015.

California Department of Transportation (Caltrans), District 7. “Caltrans Wants Your Input on SR-710 Surplus Property Regs,” <http://caltransd7info.blogspot.com/2014/07/caltrans-wants-your-input-on-sr-710.html>, accessed February 2, 2015.

California Department of Transportation (Caltrans). “Press Release: Caltrans to Host Two Public Workshops to Address SR-710 Surplus Property Regulations,” <http://www.dot.ca.gov/dist07/sync/pr/SR-710%20Public%20Workshops.pdf>, accessed February 2, 2015.

California Department of Transportation (Caltrans). Desk Guide, Environmental Justice in Transportation Planning and Investments, http://www.dot.ca.gov/hq/tpp/offices/ocp/ej_titlevi_files/EnvironmentalJusticeDeskGuideJan2003.pdf, accessed May 2, 2014.

California Department of Transportation (Caltrans). Environmental Handbook Volume 4 – Community Impact Assessment. 2011.

California Department of Transportation (Caltrans). *Historical Resources Evaluation Report (HRER) for Properties Owned by the California Department of Transportation (Caltrans) in the State Route 710 Corridor in Los Angeles, South Pasadena, and Pasadena*, Volumes I–III. 2008. Volume I updated in 2014, and Volumes II and III updated in 2013.

California Department of Transportation (Caltrans). Volume 4 - Standard Environmental Reference Handbook, “Chapter 8, Title VI and Environmental Justice,” 2011 Update.

California State Auditor. August 2012, California Department of Transportation. Report 2011-2010, <http://www.bsa.ca.gov/pdfs/reports/2011-120.pdf>.

California State Legislature. Senate Bill No. 416. http://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201320140SB416.

CH2M Hill. Environmental Data Resources (EDR) Report, Phase 1 Initial Site Assessment, SR-710 North Study, prepared for the Los Angeles County Metropolitan Transportation Authority. August 2014)

City of Los Angeles. Northeast Los Angeles Community Plan. 1999.

City of Pasadena. Heritage: A Short History of Pasadena, Pasadena Becomes a City: 1886-1920, <http://ww2.cityofpasadena.net/History/1886-1920.asp>, accessed March 25, 2013.

City of Pasadena. Heritage: A Short History of Pasadena, Pasadena Endures the Depression and War: 1930-1950, <http://ww2.cityofpasadena.net/History/1930-1950.asp>, accessed March 25, 2013.

- City of Pasadena. Heritage: A Short History of Pasadena, Pasadena Faces the Challenge: 1950-1970, <http://ww2.cityofpasadena.net/History/1950-1970.asp>, accessed March 25, 2013.
- City of Pasadena. Heritage: A Short History of Pasadena, Pasadena Seeks to Balance Growth & Preservation: 1970-Present, <http://ww2.cityofpasadena.net/History/1970.asp>, accessed March 25, 2013.
- City of Pasadena. Pasadena General Plan, as amended 2002 and 2004.
- City of South Pasadena. Mission Street Specific Plan, as amended 1996.
- City of South Pasadena. South Pasadena General Plan, as amended 1998 and 2001.
- Council on Environmental Quality. “Environmental Justice under the National Environmental Policy Act,” December 10, 1997, <http://ceq.hss.doe.gov/nepa/regs/ej/justice.pdf>, accessed May 2, 2014.
- El Sereno Historical Society. El Sereno’s History, <http://www.elsereno90032.org/>, accessed April 5, 2013.
- Google Earth, accessed January 2015–April 2015.
- Senate Bill No. 416
http://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201320140SB416
- Southern California Association of Governments (SCAG). 2012 Regional Transportation Plan Growth Forecast.
- Southern California Association of Governments (SCAG). City Population 2000 and 2010, <http://www.scag.ca.gov/census/>, accessed February 17, 2015.
- State Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2014 with 2010 Census Benchmark, http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/documents/E-5_2014_Internet_Version.xls, accessed February 10, 2015.
- United States Census Bureau, 2010 Census data, Los Angeles, California Table DP-1, http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_DP_DPDP1, accessed February 17, 2015.

United States Census Bureau, Preliminary Estimate of Weighted Average Poverty Thresholds for 2014, January 16, 2015, <http://www.census.gov/hhes/www/poverty/data/threshld/14PRELIMINARY.xls>, accessed February 26, 2015.

United States Census Bureau. 2009–2013 American Community Survey (ACS), Tables DP03 and DP04.

United States Census Bureau. 2010 Census data, Pasadena, California Table DP-1, http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_DP_DPDP1, accessed February 17, 2015.

United States Census Bureau. 2010 Census data, South Pasadena, California Table DP-1, http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_DP_DPDP1, accessed February 17, 2015.

United States Census Bureau. 2010 Census data, Table DP-1, http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_DP_DPDP1, accessed April 4, 2013.

United States Department of Health and Human Services. 2015 Poverty Guidelines, <http://aspe.hhs.gov/poverty/15poverty.cfm>, accessed February 26, 2015.

Chapter 7 Comments and Coordination

The California Environmental Quality Act (CEQA) Guidelines (14 California Code of Regulations [CCR], Sections 15082–15083) recommend that State and local lead agencies use a public scoping process to help identify the various issues to be addressed in the environmental document. Scoping allows public agencies and the general public to learn about the proposed project and to provide suggestions regarding alternatives and the types of impacts to be evaluated.

This chapter summarizes the results of the affected jurisdictions and the efforts of the California Department of Transportation (Caltrans) to fully identify, address, and resolve project-related issues through early and continuing public involvement and agency coordination. Early and continuing coordination with the general public and public agencies is an essential part of the environmental process.

7.1 Scoping Process

7.1.1 Notice of Preparation

The scoping process for the State Route 710 (SR-710) Surplus Property Sales was initiated with the preparation and distribution of a Notice of Preparation (NOP). The NOP was posted at the State Clearinghouse and circulated to public agencies and other interested parties in compliance with Section 15082 of the CEQA Guidelines on July 2, 2014. The NOP notified the public of the Environmental Impact Report (EIR) being prepared, along with instructions on how to provide comments on the project. A copy of the NOP is provided in Appendix I.

7.1.2 Comments Received During Scoping

Fourteen comments were received from various agencies and members of the general public in response to the NOP. Key issues included, but were not limited to, hazardous waste, community impacts, and historical resources.

7.2 Consultation and Coordination with Agencies

7.2.1 SHPO Consultation

Consultation with the State Historic Preservation Office (SHPO) was initiated on March 18, 2015, with regard to the proposed transfer (sale) of 113 properties listed in or eligible for listing in the National Register of Historic Places (National Register), or are historical resources for the purposes of CEQA (Historic Resource Compliance Report [HRCR], Volume I, Historic Properties [Caltrans 2015]). Pursuant to Public

Resources Code (PRC) 5024.5 and Stipulation X.B.2.c of the *Memorandum of Understanding Between the California Department of Transportation and the California State Historic Preservation Officer Regarding Compliance with Public Resources Code 5024 and Governor's Executive Order W-26-92 (5024 MOU)*, Caltrans has found that the project will have no adverse effect on properties on the Master List of Historical Resources located within the project area limits.

On April 16, 2015, Caltrans Professionally Qualified Staff (PQS) Kelly Ewing-Toledo held a meeting with interested preservation organizations, local governments within the project area, and staff from the Office of Historic Preservation to discuss methods and options available for the continued protection of historical resources throughout the sales process. The purpose of the meeting was to share information on the types of historic covenants, easements, or other agreements that have been successfully implemented by their organizations, and to share the options that are available for Caltrans to implement. No decisions were made as a result of this meeting. A second meeting (field meeting) was conducted on May 21, 2015, to enable the parties to view the current conditions of a number of State-owned historical resources subject to the sale.

On May 2, 2016, Caltrans PQS Kelly Ewing-Toledo submitted a letter to the Office of Historic Preservation requesting concurrence with the Caltrans finding of no adverse effect. The letter summarized the extensive consultation between the National Trust for Historic Preservation, the Los Angeles Conservancy, Pasadena Heritage, and the City of South Pasadena, and the efforts between the organizations to protect the historic character and features of selected properties. The letter is located in Appendix J.

The SHPO was able to concur with the Caltrans finding of no adverse effect for the action on July 28, 2016. The protective covenants or easements, the identification of third-party assignees, and the agreements for future monitoring are being developed at this time to ensure a no adverse effect to properties on the Master List of Historical Resources. Consultation will continue throughout the sale process, and Caltrans will submit draft covenants to the SHPO for review and approval prior to being finalized. The letter is located in Appendix J.

7.2.2 City of Pasadena Consultation

Some parcels included within the scope of this action are unimproved and vacant and have therefore been offered to their respective city in accordance with Streets and

Highways Code 118.6. They are not subject to the Affordable Sales Program (ASP) regulations, but are included in this document in order to examine the potential environment impacts of the entire action. The parcels that fall under this exception that are within the City of Pasadena are:

Address	Caltrans Parcel No.
245 Waverly Drive	46819
255 Waverly Drive	46820
375 Havendale Drive	46832
405 Havendale Drive	46834
275 Bellevue Drive	49327 and 46835
272 Bellevue Drive	49328 and 46838

On July 9, 2014, Caltrans sent a letter to the City of Pasadena offering the sale of the vacant parcels listed above at fair market value. On May 25, 2015, and July 20, 2015, the City of Pasadena declined the offer due to economics and potential development. The declined properties consist of the following: 245 Waverly Drive, 255 Waverly Drive, 375 Havendale Drive, and 405 Havendale Drive.

7.2.3 City of South Pasadena Consultation

Some parcels included within the scope of this action are unimproved and vacant and have therefore been offered to their respective city in accordance with Streets and Highways Code 118.6. They are not subject to ASP regulations, but are included in this document in order to examine the potential environment impacts of the entire action. The parcels that fall under this exception that are within the City of South Pasadena are:

Address	Caltrans Parcel No.
821 Bonita Drive	41597
804 Valley View Road	62582
2006 Berkshire Avenue	64544
728 Bonita Drive	68222
1107 Grevelia Street	68499

On July 9, 2014, a letter was sent to the City of South Pasadena offering the sale of the vacant parcels listed above at fair market value. The City of South Pasadena responded with a letter on July 14, 2014, accepting the opportunity to purchase the vacant parcels.

7.2.4 Community Outreach and Information Meetings

Caltrans District 7 Division of Right of Way has conducted community outreach in order to solicit public comment and input on the regulations that outline how the

surplus properties would be sold under the ASP program. That effort was conducted separately from this environmental document.

On May 30, 2014, Caltrans released the first draft of the proposed ASP regulations and requested public comment through July 14, 2014. This deadline was later extended to September 2, 2014. Caltrans Division of Right of Way also facilitated public hearings for interested parties to make comment on the proposed regulations, consistent with the requirements of the California Administrative Procedures Act. These hearings took place on July 15 and 17, 2014, at California State University, Los Angeles, and the Pasadena Convention Center, respectively. A third hearing was held August 21, 2014 at the Los Angeles Presbyterian Church. At the hearings, any person was able to present comments, objections, and/or recommendations relevant to the proposed ASP regulations. All comments received at these hearings, written and oral, became part of the official record and will be addressed according to the Office of Administrative Law's policy and procedures as a part of the ASP regulation process.

In response to community and stakeholder comments, Caltrans withdrew the proposed ASP regulations and resubmitted them for a public comment period beginning February 27, 2015. The comment period closed April 13, 2015. A set of public hearings were held on April 20 and 21, 2015, at the Pasadena Convention Center and California State University, Los Angeles, respectively.

7.3 Distribution of the Draft Environmental Impact Report

7.3.1 Draft Environmental Impact Report Comment Period

Caltrans published a Notice of Availability and Notice of Public Hearing on July 8, 2015, which indicated that the Draft Environmental Impact Report (DEIR) was available for public review and comment until August 24, 2015. The notice was published in the following newspapers:

- Eastern Publishing Group (Spanish/English) – Thursday, July 9, 2015
- Pasadena Weekly (English) – Wednesday, July 8, 2015

To increase awareness of the environmental document, Caltrans and the consultant team placed a second round of newspaper ads to announce the extension of the public comment period to September 8, 2015. The second notice was published in the following newspapers:

- Eastside Sun (Spanish/English) – Thursday, August 27, 2015
- Pasadena Star-News (English) – Friday, August 28, 2015
- Pasadena Weekly (English) – Friday, August 28, 2015

Copies of the DEIR were available for review at Caltrans' District 7 Office located at 100 South Main Street, Los Angeles, CA 90012, and at the following local libraries:

- Alhambra Civic Center Library, 101 S. 1st Street Alhambra, CA 91801
- San Rafael Library, 1240 Nithsdale Road, Pasadena, CA 91105
- Pasadena Central Library, 285 Walnut Street, Pasadena, CA 91101
- Allendale Library, 1130 S. Marengo Avenue, Pasadena CA 91106
- El Sereno Library, 5226 Huntington Drive South, Los Angeles, CA 90032
- South Pasadena Library, 1100 Oxley Street, South Pasadena, CA 91030

In addition, the DEIR was also available online at <http://www.dot.ca.gov/d7/env-docs/>. Interested stakeholders were also encouraged to submit their comments online at <http://www.710propertysalescomments.com>.

7.3.2 Public Hearing

Caltrans conducted two public hearings for the DEIR. The first public hearing was held on Thursday, August 6, 2015, at Los Angeles Presbyterian Church, located at 2241 N. Eastern Avenue, Los Angeles, CA 90032, from 6:00 p.m. to 8:00 p.m. The second public hearing was held on Monday, August 10, 2015, at the Hilton Pasadena in the International Room, located at 168 South Robles Avenue, Pasadena, CA 91101, from 6:00 p.m. to 8:00 p.m.

Upon arrival, participants were encouraged to sign-in and pick up informational materials, review the public hearing agenda, and talk with Caltrans and consultant staff. Participants were also provided with a comment card to allow them to provide input and suggestions on the DEIR. Participants were also provided a speaker card to assist with calling up speakers to comment in an orderly manner. At both of the public hearings, a court reporter was present to transcribe all of the oral public comments, and a Spanish translator was readily available if needed. Furthermore, Caltrans staff and the consultant team (LSA Associates, Inc., and Arellano Associates) provided a PowerPoint presentation that reviewed the following:

- Purpose of the Meeting and Meeting Format
- Overview of Proposed Action

- Environmental Review Process
- Purpose and Need for the Action
- Legislation and Regulations
- Details for Each of the Alternatives Considered
- How to Provide Public Comments

Throughout the duration of each of the public hearings, five computer work stations with Wi-Fi access were made readily available to attendees to submit their comments online. All comments received during the public circulation period along with Caltrans' responses can be found in Appendix D, Comments and Responses on Draft Environmental Impact Report.

Chapter 8 Distribution List

8.1 Tenants

Kea Duggan
Los Angeles Conservation Corp
P.O. Box 15868
Los Angeles, CA 90015

All Valley Washer Service
3931 Stockbridge Ave
Los Angeles, CA 90032

Clear Channel Media Group
5460 Huntington Drive
Los Angeles, CA 90032

Grifols Biologicals
5555 Valley Blvd
Los Angeles, CA 90032

Lily Adatao
4451 Alpha St
Los Angeles, CA 90032

Lorraine Alegria
3412 Sheffield Ave
Los Angeles, CA 90032

Milton Aleman
5540 Poplar Blvd
Los Angeles, CA 90032

Art Alfaro
3400 Sheffield Ave
Los Angeles, CA 90032

Maria Almeida
3218 Sheffield Ave
Los Angeles, CA 90032

Candice Alvillar
5523 Allan St
Los Angeles, CA 90032

Luis Amaya
3137 Sheffield Ave
Los Angeles, CA 90032

Margie Anaya
5541 Poplar Blvd
Los Angeles, CA 90032

Margarita Arreola
5429 Poplar Blvd
Los Angeles, CA 90032

Annette Arvizu
5564 Concord Ave
Los Angeles, CA 90032

Maria Baez
4005 Lowell Ave
Los Angeles, CA 90032

Elisa Bakey
4363 Maycrest Ave
Los Angeles, CA 90032

Joseph Bello
3422 Sheffield Ave
Los Angeles, CA 90032

E.J. Bennett
3719 Sheffield Ave
Los Angeles, CA 90032

Sarah Betancourt
3423 Sheffield Ave
Los Angeles, CA 90032

Rebecca Biera
3418 Sheffield Ave
Los Angeles, CA 90032

Brenda Blanco
3519 Sheffield Ave
Los Angeles, CA 90032

Luis Bonilla
3415 Sheffield Ave
Los Angeles, CA 90032

Yolanda Botello
3927 Stockbridge Ave
Los Angeles, CA 90032

German Botello
3951 Lowell Ave
Los Angeles, CA 90032

Marco Briones
5515 Poplar Blvd
Los Angeles, CA 90032

Jason Brown
5536 Templeton Street
Los Angeles, CA 90032

Michael Caballero
3201 Sheffield Ave
Los Angeles, CA 90032

Haydee Caceres
2970 Lowell Ave
Los Angeles, CA 90032

Jackie Casillas
4332 Lowell Ave
Los Angeles, CA 90032

Jeannie Casillas
4334 1/2 Lowell Ave
Los Angeles, CA 90032

Helsa Casillas
5541 Allan Street
Los Angeles, CA 90032

David Castillo
3123 Sheffield Ave
Los Angeles, CA 90032

Ruby Cervantes
4326 Lowell Ave
Los Angeles, CA 90032

Josephine Chaffino
5519 Allan Street
Los Angeles, CA 90032

Victoria Chavez
5522 Norwich Ave
Los Angeles, CA 90032

Darlene Chrysler
3134 Sheffield Ave
Los Angeles, CA 90032

David Cobla
3335 Sheffield Ave
Los Angeles, CA 90032

Javier Contreras
3331 Sheffield Ave
Los Angeles, CA 90032

Saul Cortez
3928 Stockbridge Ave
Los Angeles, CA 90032

Frank Cruz
3314 Sheffield Avenue
Los Angeles, CA 90032

Thomas Dahl
5523 Norwich Ave
Los Angeles, CA 90032

Kathy De La Rosa
3209 Sheffield Ave
Los Angeles, CA 90032

Darlene Diaz
3226 Lowell Ave
Los Angeles, CA 90032

Yvonne Duran
3431 Sheffield Ave
Los Angeles, CA 90032

Jaime Espinoza
4364 Maycrest Ave
Los Angeles, CA 90032

Gregorio Flores
3935 Stockbridge Ave
Los Angeles, CA 90032

Antonio Flores
5536 Allan Street
Los Angeles, CA 90032

Richard Garcia
3200 Sheffield Ave
Los Angeles, CA 90032

Hugo Garcia
4432 Maycrest Ave
Los Angeles, CA 90032

Amanda Gomes
5458 Shelley St
Los Angeles, CA 90032

Ricardo Colorado
4317 Maycrest Ave
Los Angeles, CA 90032

Mary Cooper
3522 Sheffield Ave
Los Angeles, CA 90032

Richard Cotignola
5524 Kendall Ave
Los Angeles, CA 90032

Margarita Cuevas
5511 Poplar Blvd
Los Angeles, CA 90032

Raymond D'Angelo
5532 Poplar Blvd
Los Angeles, CA 90032

Teresa De La Rosa
3226 Sheffield Ave
Los Angeles, CA 90032

Elizabeth Diblasio
3122 Sheffield Ave
Los Angeles, CA 90032

Rafael Escobar
3125 Winchester
Los Angeles, CA 90032

Kay Faddis
3515 Sheffield Ave
Los Angeles, CA 90032

Alfred Flores
5519 Poplar Blvd
Los Angeles, CA 90032

Karen Franco
5506 Templeton Street
Los Angeles, CA 90032

Rosalva Garcia
3216 Sheffield Ave
Los Angeles, CA 90032

Cruz Garcia
5537 Norwich Avenue
Los Angeles, CA 90032

Oralia Gomez
3716 Sheffield Ave
Los Angeles, CA 90032

Evelyn Concebida
3427 Sheffield Ave
Los Angeles, CA 90032

Ricky Cortez
3534 Sheffield Ave
Los Angeles, CA 90032

Maria Crespo
4422 Maycrest Ave
Los Angeles, CA 90032

Libby Curiel
4316 Maycrest Ave
Los Angeles, CA 90032

Robert De La Fuente
4442 Maycrest Ave
Los Angeles, CA 90032

Christina Delgado
3430 Lowell Ave
Los Angeles, CA 90032

Beatrice Dominguez
5531 Templeton Street
Los Angeles, CA 90032

Martin Espinoza
4360 Maycrest Ave
Los Angeles, CA 90032

Mark Flores
3408 Sheffield Ave
Los Angeles, CA 90032

Arthur Flores
5528 Allan Street
Los Angeles, CA 90032

Angelina Garcia
3131 Sheffield Ave
Los Angeles, CA 90032

Edmundo Garcia
3419 Sheffield Ave
Los Angeles, CA 90032

Guadalupe Gibson
2958 Lowell Ave
Los Angeles, CA 90032

Rene Gonzalez
4417 Alpha St
Los Angeles, CA 90032

Charles Grays
5520 Templeton Street
Los Angeles, CA 90032

Maria Guerra
5460 Newtonia Ave
Los Angeles, CA 90032

Corina Guerrero
3330 Sheffield Ave
Los Angeles, CA 90032

Lourdes Guerrero
3911 Stockbridge Ave
Los Angeles, CA 90032

Genny Guerrero
5540 Norwich Ave
Los Angeles, CA 90032

Daniel Guzman
3837 Sheffield Ave
Los Angeles, CA 90032

Hope Guzman
5454 Keats St
Los Angeles, CA 90032

Darlene Harwood
5524 Allan Street
Los Angeles, CA 90032

Felix Hernandez
3319 Sheffield Ave
Los Angeles, CA 90032

Lilian Hernandez
3518 Sheffield Ave
Los Angeles, CA 90032

Nellie Herrera
5513 Atlas St
Los Angeles, CA 90032

Sarah Hirsch
5518 Norwich Ave
Los Angeles, CA 90032

Sergio Holguin
5550 Concord Ave
Los Angeles, CA 90032

Rachel Houston
5544 Allan Street
Los Angeles, CA 90032

Jesse Huerta
4359 Maycrest Ave
Los Angeles, CA 90032

Warren Hutchins
5477 Keats St
Los Angeles, CA 90032

Alba Jiron
3823 Sheffield Ave
Los Angeles, CA 90032

Molly Johnson
4312 Maycrest Ave
Los Angeles, CA 90032

Jamma Kennedy
4226 Maycrest Ave
Los Angeles, CA 90032

Carmen Leyva
3206 Sheffield Ave
Los Angeles, CA 90032

Robert Logan
3841 Sheffield Ave
Los Angeles, CA 90032

Salvador Lomeli
3710 Sheffield Ave
Los Angeles, CA 90032

Isabel Lomeli
3913 Stockbridge Ave
Los Angeles, CA 90032

Luz Elena Lopez
3145 Sheffield Ave
Los Angeles, CA 90032

Richard Lopez
3404 Sheffield Ave
Los Angeles, CA 90032

Aurora Lopez
5464 Shelley St
Los Angeles, CA 90032

Annette Lozoya
3537 Sheffield Ave
Los Angeles, CA 90032

Mary Luna
3339 Sheffield Ave
Los Angeles, CA 90032

Rose Luna-Mariscal
3715 Sheffield Ave
Los Angeles, CA 90032

Crystal Machado
3711 Sheffield Ave
Los Angeles, CA 90032

Virginia Mancilla
3706 Sheffield Ave
Los Angeles, CA 90032

Sandra Martin
3540 Sheffield Ave
Los Angeles, CA 90032

James Martin
5476 Keats St
Los Angeles, CA 90032

Elvia Martinez
4507 Alpha St
Los Angeles, CA 90032

Sylvia Martinez
5532 Norwich Ave
Los Angeles, CA 90032

Violet McMahon
3953 Lowell Ave
Los Angeles, CA 90032

Maria Mejia
4007-C Lowell Ave
Los Angeles, CA 90032

David Mercado
3409 Sheffield Ave
Los Angeles, CA 90032

Paul Miller
5460 Keats St
Los Angeles, CA 90032

Carlos Miranda
3529 Sheffield Ave
Los Angeles, CA 90032

Enrique Miranda
5459 Shelley St
Los Angeles, CA 90032

Candelario Miranda
5537 Poplar Blvd
Los Angeles, CA 90032

Marcus Mixon
3219 Sheffield Ave
Los Angeles, CA 90032

Jose Morales
3138 Lowell Ave
Los Angeles, CA 90032

Yolanda Moreno
4362 Maycrest Ave
Los Angeles, CA 90032

Marcelina Navejas
3949 Lowell Ave
Los Angeles, CA 90032

Hector Ortega
4358 Maycrest Ave
Los Angeles, CA 90032

Patricia Payan
3514 Sheffield Ave
Los Angeles, CA 90032

Annette Perales
3318 Sheffield Avenue
Los Angeles, CA 90032

Ricardo Perez
5450 Shelley St
Los Angeles, CA 90032

Dave Petzold
3223 Sheffield Ave
Los Angeles, CA 90032

Kathy Prieto
5536 Norwich Ave
Los Angeles, CA 90032

Armando Quezada
5532 Allan Street
Los Angeles, CA 90032

John Ramos
5466 Almont St
Los Angeles, CA 90032

Manuel Razo
5515 Allan Street
Los Angeles, CA 90032

Joe Rivera
5522 Templeton St.
Los Angeles, CA 90032

John Molano
3126 Sheffield Ave
Los Angeles, CA 90032

Estella Morales
3817 Sheffield Ave
Los Angeles, CA 90032

Celia Moreno
4401 Maycrest Ave
Los Angeles, CA 90032

Dora Nevarez
2962 Lowell Ave
Los Angeles, CA 90032

Alfred Ortiz
5514 Poplar Blvd
Los Angeles, CA 90032

Sirena Pellarollo
5467 Shelley St
Los Angeles, CA 90032

Jennifer Perez
3127 Sheffield Ave
Los Angeles, CA 90032

Jorge Perez
5533 Poplar Blvd
Los Angeles, CA 90032

Rachel Ponce
3327 Sheffield Ave
Los Angeles, CA 90032

Alva Puertas
5514 Allan St
Los Angeles, CA 90032

Hugo Quintana
5460 Shelley St
Los Angeles, CA 90032

Graciela Rangel
3343 Sheffield Ave
Los Angeles, CA 90032

Maria Rendon
3822 Sheffield Ave
Los Angeles, CA 90032

Socorro Rodriguez
3326 Sheffield Ave
Los Angeles, CA 90032

Fred Montoya
3135 Sheffield Ave
Los Angeles, CA 90032

Anastasio Moreno
3338 Sheffield Ave
Los Angeles, CA 90032

Olivia Navarro
3818 Sheffield Ave
Los Angeles, CA 90032

Rosie Ortega
3720 Sheffield Ave
Los Angeles, CA 90032

Irma Parisi
3923 Stockbridge Ave
Los Angeles, CA 90032

John Pena
3114 Sheffield Ave
Los Angeles, CA 90032

Arthur Perez
3827 Sheffield Ave
Los Angeles, CA 90032

Barbara Perez
5538 Allan Street
Los Angeles, CA 90032

Lisa Prieto
3210 Sheffield Ave
Los Angeles, CA 90032

Linda Puppe
3541 Sheffield Ave
Los Angeles, CA 90032

Virginia Ramirez
5506 Allan Street
Los Angeles, CA 90032

Rachel Raymond
3401 Sheffield Ave
Los Angeles, CA 90032

Manuel Reyes
5501 Templeton Street
Los Angeles, CA 90032

Rosalie Rodriguez
3426 Sheffield Ave
Los Angeles, CA 90032

Angela Rodriguez
3815 Sheffield Ave
Los Angeles, CA 90032

Gloria Rodriguez
5539 Poplar Blvd
Los Angeles, CA 90032

Josephine Romero
4329 Maycrest Ave
Los Angeles, CA 90032

Caroline Romero
5474 Newtonia Dr
Los Angeles, CA 90032

Mary Ruiz
3917 Stockbridge Ave
Los Angeles, CA 90032

Cruz Ruiz
5502 Templeton Street
Los Angeles, CA 90032

Efrain Ruiz
5533 Norwich Ave
Los Angeles, CA 90032

Joseph Salas
3138 Sheffield Ave
Los Angeles, CA 90032

Edward Salaz
5511 Allan Street
Los Angeles, CA 90032

Eddie Salazar
5532 Templeton St.
Los Angeles, CA 90032

Margaret Saldana
3526 Sheffield Ave
Los Angeles, CA 90032

Ramiro Salinas
3405 Sheffield Ave
Los Angeles, CA 90032

Patricio Sanchez
4339 Maycrest Ave
Los Angeles, CA 90032

Lydia Sanchez
5470 Keats St
Los Angeles, CA 90032

Josephine Sandoval
4302 Maycrest Ave
Los Angeles, CA 90032

Frank Saucedo
3836 Sheffield Ave
Los Angeles, CA 90032

Palmira Sepulveda
4326 Maycrest Ave
Los Angeles, CA 90032

Jose Serna
3705 Sheffield Ave
Los Angeles, CA 90032

Mara Serrato
4423 Maycrest Ave
Los Angeles, CA 90032

Okano Shigeyuki
5501 Berkshire Dr
Los Angeles, CA 90032

David Solis
3723 Sheffield Ave
Los Angeles, CA 90032

Dolores Soto
4332 Maycrest Ave
Los Angeles, CA 90032

Angie Soto
5515 Templeton Street
Los Angeles, CA 90032

Clinton Stevenson
3342 Sheffield Ave
Los Angeles, CA 90032

Myra Storms
3939 Stockbridge Ave
Los Angeles, CA 90032

Anna Sullivan
5523 Templeton Street
Los Angeles, CA 90032

Jim Tharpe
2968 Lowell Ave
Los Angeles, CA 90032

Diana Tiscareno
5518 Allan Street
Los Angeles, CA 90032

Regina Todd
3533 Sheffield Ave
Los Angeles, CA 90032

Blanca Torres
5464 Keats St
Los Angeles, CA 90032

Sergio Torres
5514 Norwich Avenue
Los Angeles, CA 90032

Rafael Torres
5537 Templeton Street
Los Angeles, CA 90032

Nabucodonozor Trevizo
4007-A Lowell Ave
Los Angeles, CA 90032

Christopher Tuttle
5507 Allan Street
Los Angeles, CA 90032

Noreen Uribe
5537 Allan Street
Los Angeles, CA 90032

Elena Valdez
5512 Atlas St
Los Angeles, CA 90032

Jennifer Valdez-Navejas
4007-B Lowell Ave
Los Angeles, CA 90032

Sabrina Valenzuela
4320 Maycrest Ave
Los Angeles, CA 90032

Victoria Valerio
3730 Lowell Ave
Los Angeles, CA 90032

Stephanie Vargas
3322 Sheffield Ave
Los Angeles, CA 90032

Antonio Vasquez
3724 Sheffield Ave
Los Angeles, CA 90032

Annie Vega
5562 Concord Ave
Los Angeles, CA 90032

Nora Verdesoto
2978 Lowell Ave
Los Angeles, CA 90032

Ana Villareal
5443 Shelley St
Los Angeles, CA 90032

Jose Villegas
3130 Sheffield Ave
Los Angeles, CA 90032

Elaine Wagner
5506 Norwich Avenue
Los Angeles, CA 90032

Carleen Ward
3523 Sheffield Ave
Los Angeles, CA 90032

Laura Westmyer
5518 Poplar Blvd
Los Angeles, CA 90032

Waltraud Wheeler
3215 Sheffield Ave
Los Angeles, CA 90032

Michelle Yescas
5541 Norwich Avenue
Los Angeles, CA 90032

Wendy Zamudio
3323 Sheffield Ave
Los Angeles, CA 90032

Margaret Zapata
5548 Concord Ave
Los Angeles, CA 90032

Alejandra Zeledon
3205 Sheffield Ave
Los Angeles, CA 90032

Irene Zuniga
3315 Sheffield Ave
Los Angeles, CA 90032

Active Recycling Co.
N/O 5575 Valley Blvd
Los Angeles, CA 90047

Web Washing Machine Service
100 N Sepulveda Blvd
El Segundo, CA 90245

Web Laundry Service
3690 Freeman Blvd
Redondo Beach, CA 90278

Muggee Management Co.
137 E Olive Ave
Monrovia, CA 91016

Sean Abajian
626 Prospect Ave K
South Pasadena, CA 91030

Martin Ashantas
705 Fairview Ave
South Pasadena, CA 91030

Janice Austgen
1707 Meridian Ave
South Pasadena, CA 91030

Diane Brockman
711 Fairview Ave
South Pasadena, CA 91030

Stephanie Buffington
1005 Buena Vista
South Pasadena, CA 91030

Michael Burch
P.O. Box 3214
South Pasadena, CA 91030

Samuel Burgess
626 Prospect Ave B
South Pasadena, CA 91030

Mary Lou Chrisman
801 Bonita Drive
South Pasadena, CA 91030

Michele Clark
226 1/2 Beacon Ave
South Pasadena, CA 91030

Michael Cuestas
1101 Pine Street
South Pasadena, CA 91030

Pamela Davis
530 Orange Grove Ave
South Pasadena, CA 91030

Roger De La Torre
1019 Foothill Street
South Pasadena, CA 91030

David Deamer
887 Flores De Oro
South Pasadena, CA 91030

Armando Delao
533 Prospect Ave
South Pasadena, CA 91030

Jackie Diamond
911 Monterey Road
South Pasadena, CA 91030

Marijane Dicandia
907 Summit Drive
South Pasadena, CA 91030

Suzanne Easter
316 Fairview Ave
South Pasadena, CA 91030

Jock Ebner
495 Prospect Avenue
South Pasadena, CA 91030

Masako Enomoto
1136 Glendon Way
South Pasadena, CA 91030

Richard Fannan
2018 Alpha Avenue
South Pasadena, CA 91030

Charles Fata
1109 Columbia Street
South Pasadena, CA 91030

Roberto Flores
2028 Berkshire Ave
South Pasadena, CA 91030

Cecelia Flores
916 Lyndon Street
South Pasadena, CA 91030

Carrie Folker
1321 Meridian Ave
South Pasadena, CA 91030

Kurt Forman
1043 Magnolia Street
South Pasadena, CA 91030

Dorothy Forthun
1002 Hope Street
South Pasadena, CA 91030

James Gilson
311 Fairview Ave
South Pasadena, CA 91030

Nicholas Glaros
1131 Glendon Way
South Pasadena, CA 91030

Michael Hannibal
1035 Foothill Street
South Pasadena, CA 91030

Shawn Hayes
885 Oneonta Drive
South Pasadena, CA 91030

Joseph Henderson
822 Valley View Rd
South Pasadena, CA 91030

Gina Howe
905 Summit Drive
South Pasadena, CA 91030

Rocio Izquierdo
863 Monterey Road
South Pasadena, CA 91030

Anthony Jackson
626 Prospect Ave A
South Pasadena, CA 91030

Patricia Jackson
908 Monterey Road
South Pasadena, CA 91030

Jennifer Jones
400 Prospect Circle
South Pasadena, CA 91030

Franklin Keeney Iv
823 Bonita Drive
South Pasadena, CA 91030

Elizabeth Kent
626 Prospect Ave D
South Pasadena, CA 91030

Michele Kim
1030 Foothill Street
South Pasadena, CA 91030

David Knighton
1722 Gillette Crescent
South Pasadena, CA 91030

Linda Krausen
P.O. Box 3461
South Pasadena, CA 91030

Nancy Kyes
1101 Columbia Street
South Pasadena, CA 91030

Heather Libeu
626 Prospect Ave E
South Pasadena, CA 91030

Mary Mahoney
705 Bonita Drive
South Pasadena, CA 91030

Albert Malafronte
910 Bonita Drive
South Pasadena, CA 91030

Lt. Brian Martin
1011 Foothill Street
South Pasadena, CA 91030

Dennis Mccullough
2042 Alpha Ave
South Pasadena, CA 91030

Phyllis Mcfarlane
626 Prospect Ave C
South Pasadena, CA 91030

Megeen Mclaughlin
854 Bank Street
South Pasadena, CA 91030

Brian Miller
225 Fairview Ave
South Pasadena, CA 91030

Karla Miller
815 Bonita Drive
South Pasadena, CA 91030

Wendy Monroy
532 Meridian Ave
South Pasadena, CA 91030

Karina Murrillo
626 Prospect Ave J
South Pasadena, CA 91030

Maria Navarro
1021 Foothill Street
South Pasadena, CA 91030

Timothy Neblung
1041 Magnolia Street
South Pasadena, CA 91030

Kerri Nouriani
1015 Columbia Street
South Pasadena, CA 91030

Alexandra O'Connor
910 Monterey Road
South Pasadena, CA 91030

Diane Owens
726 Meridian Ave
South Pasadena, CA 91030

Judith Packard
1107 Foothill Street
South Pasadena, CA 91030

Christopher Patterson
1724 Gillette Crescent
South Pasadena, CA 91030

Charles Purnell
P.O. Box 3452
South Pasadena, CA 91030

Charles Raggio
845 Bank Street
South Pasadena, CA 91030

Jaime Regalado
626 Prospect Ave L
South Pasadena, CA 91030

Marie Risigari-Gai
534 Orange Grove Ave
South Pasadena, CA 91030

Linda Rivas
709 Fairview Ave
South Pasadena, CA 91030

Kevin Robison
626 Prospect Ave H
South Pasadena, CA 91030

Makeda Sanyika
707 Fairview Ave
South Pasadena, CA 91030

Marilyn Shatz
2007 Cambridge Place
South Pasadena, CA 91030

James Sherman
825 Bonita Drive
South Pasadena, CA 91030

Michael Spence
903 Monterey Road
South Pasadena, CA 91030

Jamie Spidle
852 Monterey Road
South Pasadena, CA 91030

Suzanne Talbot
2011 Cambridge Place
South Pasadena, CA 91030

Bruce Teague
2035 Berkshire Ave
South Pasadena, CA 91030

Richard Watson
226 Beacon Ave
South Pasadena, CA 91030

Michelle Weetman
529 Prospect Ave
South Pasadena, CA 91030

Andrea Weinbrecht
1821 Meridian Ave
South Pasadena, CA 91030

Marysia Wojcik
511 Prospect Ave
South Pasadena, CA 91030

Patricia Wood
1041 Foothill Street
South Pasadena, CA 91030

Herbert Worthington
626 Prospect Ave M
South Pasadena, CA 91030

Cynthia Wright
1010 Hope Street
South Pasadena, CA 91030

Nyczak Zbigniew
1325 Meridian Ave
South Pasadena, CA 91030

Nancy Mirkoff
P.O. Box 661823
Arcadia, CA 91066

Sequoyah School
535 Pasadena Ave.
Pasadena, CA 91105

Waverly School
67 W Bellevue Dr
Pasadena, CA 91105

734 Pasadena Ave.
Pasadena, CA 91105

Ronald Mcdonald House
763 Pasadena Ave.
Pasadena, CA 91105

H.S.A.U.W.C.
950 Holly Vista Dr
Pasadena, CA 91105

Emily (Wood) Mencken
Nursery Cottage
169 Arlington Drive
Pasadena, CA 91105

Anne Alderson
929 Pasadena Ave.
Pasadena, CA 91105

David Arnay
202 Madeline Drive
Pasadena, CA 91105

Judy Barbatoe
1059 Pasadena Ave.
Pasadena, CA 91105

Ricardo Barrantes
1265 La Loma Dr
Pasadena, CA 91105

Brigitte Bergman
215 Wigmore Drive
Pasadena, CA 91105

Caroline Bramhall
955 Pasadena Ave.
Pasadena, CA 91105

Kelly Brinkman
711 Pasadena Ave.
Pasadena, CA 91105

Lesley Bryan
726 St. John Ave.
Pasadena, CA 91105

Armand Bytton
956 Pasadena Ave.
Pasadena, CA 91105

Robert Calix
231 Wigmore Drive
Pasadena, CA 91105

Rocio Camarena
926 Pasadena Ave.
Pasadena, CA 91105

Greg Carlson
1112 Pasadena Ave.
Pasadena, CA 91105

Andra Carlson
216 California Blvd. W.
Pasadena, CA 91105

Carmen Carrasco
1041 Pasadena Ave.
Pasadena, CA 91105

Eduardo Castro
1150 Pasadena Ave.
Pasadena, CA 91105

Lorraine Clearman
232 State Street
Pasadena, CA 91105

Roger Cooper
California Department of General
Services
762 St. John Ave.
Pasadena, CA 91105

Luis Corrales
203 Bellefontaine St.
Pasadena, CA 91105

Julia Cox
714 St. John Ave.
Pasadena, CA 91105

Jennifer Detterich 250 Wigmore Drive Pasadena, CA 91105	Elizabeth Diaz 925 Jane Place Pasadena, CA 91105	Rolando Ecarma 190 California Blvd. W. Pasadena, CA 91105
Michelle Floan 650 St. John Ave. Pasadena, CA 91105	Richard Frasier (Garage) 224 W State St Pasadena, CA 91105	Edmund Fry 801 Pasadena Ave. Pasadena, CA 91105
Dana Garber 602 St. John Ave. Pasadena, CA 91105	Glenn Gardner 229C California Blvd. W. Pasadena, CA 91105	St. Jon Gauthier 1090 Pasadena Ave. Pasadena, CA 91105
Alfonso Glenn 212 California Blvd. W. Pasadena, CA 91105	Jonathan Green 1080 Pasadena Ave. Pasadena, CA 91105	Jennifer Haagenson 208 California Blvd. W. Pasadena, CA 91105
Brian Habicht 180 Arlington Dr Pasadena, CA 91105	James Haddad 244 Arlington Dr. Pasadena, CA 91105	Renondo Hahn 204 California Blvd. W. Pasadena, CA 91105
Timothy Halpin 225 Madeline Drive Pasadena, CA 91105	Crystal Halpin 385 Havendale Dr. Pasadena, CA 91105	Willie Harewood 600 St. John Ave. Pasadena, CA 91105
Nicole Harrity 679 Pasadena Ave. Pasadena, CA 91105	Juan Hernandez 584 St. John Ave. Pasadena, CA 91105	William Hess 966 Pasadena Ave. Pasadena, CA 91105
Curt Hettinger 165 Hurlbut St. Pasadena, CA 91105	Carolyn Hill 214 California Blvd. W. Pasadena, CA 91105	Claire Hoffman 230 Madeline Drive Pasadena, CA 91105
Sylvia Huerta 225B California Blvd. W. Pasadena, CA 91105	Soo Jang 185 Glenarm St. Pasadena, CA 91105	Harry Kaminski 1128 Pasadena Ave. Pasadena, CA 91105
Sydney Kirkpatrick 876 Pasadena Ave. Pasadena, CA 91105	Susan Koenig 205 Madeline Drive Pasadena, CA 91105	Fred Koster 1175 Pasadena Ave. Pasadena, CA 91105
Elizabeth Kouri 214 State Street Pasadena, CA 91105	Candace Kromer 218 Madeline Drive Pasadena, CA 91105	John Kvammen 696 St. John Ave Pasadena, CA 91105
Rachel Lang 1120 Pasadena Ave. Pasadena, CA 91105	Linda Lau 670 St. John Ave. Pasadena, CA 91105	Loren Lipson 953 Pasadena Ave. Pasadena, CA 91105
Michael Mckinney 235 Bellefontaine St. Pasadena, CA 91105	Arthur Michaud 1141 Pasadena Ave. Pasadena, CA 91105	Theodore Miller 212 Wigmore Drive Pasadena, CA 91105
Eilyn Miller 245 Wigmore Drive Pasadena, CA 91105	Maria Montoya 936 Pasadena Ave. Pasadena, CA 91105	Angela Nadjafi 233 California Blvd. W. Pasadena, CA 91105

Ben Neil
678 St. John Ave.
Pasadena, CA 91105

Paul Paggi
1140 Pasadena Ave.
Pasadena, CA 91105

Michael Pajka
866 Pasadena Ave.
Pasadena, CA 91105

Sunja Park
935 Jane Place
Pasadena, CA 91105

Alexandra Pike
240 State Street
Pasadena, CA 91105

Linda Posod
888 Pasadena Ave.
Pasadena, CA 91105

William Powell
242 Bellefontaine St.
Pasadena, CA 91105

Prencia Purnell
1051 Pasadena Ave.
Pasadena, CA 91105

Lydia Quinn
1100 Pasadena Ave.
Pasadena, CA 91105

Matthew Raab
202 California Blvd.
Pasadena, CA 91105

Uzma Rafik
216 Arlington Dr
Pasadena, CA 91105

William Regan
265 Waverly Drive
Pasadena, CA 91105

Clinton Rodgers
1191 Pasadena Ave.
Pasadena, CA 91105

Juan-Carlos Rodriquez
181 Arlington Dr
Pasadena, CA 91105

Laura Romero
737 Pasadena Ave.
Pasadena, CA 91105

Zoe Rowe
206 California Blvd.
Pasadena, CA 91105

Robert Rowe
734 St. John Ave.
Pasadena, CA 91105

Marisol Sanchez
231 California Blvd. W.
Pasadena, CA 91105

Jon Sexton
215 Madeline Drive
Pasadena, CA 91105

Stanley Sieger
163 State Street
Pasadena, CA 91105

Bernard Sparks
229B California Blvd. W.
Pasadena, CA 91105

Eugene Strand
1207 Pasadena Ave.
Pasadena, CA 91105

Nancy Stubbs
1062 Pasadena Ave.
Pasadena, CA 91105

Son Sun
646 St. John Ave.
Pasadena, CA 91105

Rose Velasquez
229D California Blvd. W.
Pasadena, CA 91105

Rebecca Volquartz
1030 Pasadena Ave.
Pasadena, CA 91105

Alejandra Von Sydow
900 Pasadena Ave.
Pasadena, CA 91105

Melanie Washington
177 Hurlbut St.
Pasadena, CA 91105

Joann Wasko
229A California Blvd. W.
Pasadena, CA 91105

Jeanette Widmaier
1190 Pasadena Ave.
Pasadena, CA 91105

Tonya Wilson
949 Pasadena Ave.
Pasadena, CA 91105

James Winstanley
225 A California Blvd.
Pasadena, CA 91105

Lizz Wolf
620 St. John Ave.
Pasadena, CA 91105

Jennifer Wood
1031 Pasadena Ave.
Pasadena, CA 91105

Arthur Zielinski
779 Pasadena Ave.
Pasadena, CA 91105

Barbara Zizi
231 Columbia Street
Pasadena, CA 91105

City of Pasadena
100 N Garfield Ave #200
Pasadena, CA 91109

8.2 Agencies

Michelle Jackson
Board Secretary
Los Angeles County Metropolitan
Transportation Authority
1 Gateway Plz
Los Angeles, CA 90012

Michael LoGrande
Director
City of Los Angeles Department of
City Planning
200 N Spring St
Los Angeles, CA 90012

Mariela Ososrio
Senior Executive Assistant
Housing Authority of the City of Los
Angeles
2600 Wilshire Blvd
Los Angeles, CA 90057

Daniel Rofoli
Rfp Notices
Housing Authority of the City of Los
Angeles
12721 S Central Ave
Los Angeles, CA 90059

Sean Rogan
Executive Director
Housing Authority of the City of Los
Angeles
12721 S Central Ave
Los Angeles, CA 90059

John Mayer
Senior Planner
City of South Pasadena
1414 Mission St
South Pasadena, CA 91030

Francis Delach
Executive Director
San Gabriel Valley Council of
Governments
1000 S Fremont Ave Bldg A-10N,
Ste 10-210
Alhambra, CA 91803

Esteban Almanza
Acting Director
California Department of General
Services
707 3rd St
West Sacramento, CA 95605

Scott Snyder
First Vice President
Native American Heritage
Association
1550 Harbor Blvd Ste 100
West Sacramento, CA 95691

Ken Alex
Director
State Clearinghouse, Office of
Planning and Research
PO Box 3044
Sacramento, CA 95812

Brian P. Kelly
Secretary
California State Transportation
Agency
915 Capitol Mall Ste 350B
Sacramento, CA 95814

Barbara Lee
Director
Department of Toxic Substances
Control
1001 I St
Sacramento, CA 95814

John Fowler
Director
Office of Historic Preservation
1725 23rd St Ste 100
Sacramento, CA 95816

Kevin Simmons
COO
Housing & Community Development
2020 W El Camino Ave
Sacramento, CA 95833

Will Kempton
Executive Director
California Transportation Commission
1120 N. Street, MS-52
Sacramento, CA 95814

8.3 Other Interested Parties

Stephanie Meeks
Executive Director
National Trust For Historic
Preservation
2600 Virginia Ave NW Ste 1000
Washington, DC 20037

Area Planning Commission (APC) /
Central
City of Los Angeles
200 N Spring St Ste 360
Los Angeles, CA 90012

Sarni Abdelatif
453 S Spring St Ste 528
Los Angeles, CA 90013

Linda Dishman
President
Los Angeles Conservancy
523 W 6th St Ste 826
Los Angeles, CA 90014

Gary L. Toebben
President & CEO
Los Angeles Chamber of Commerce
350 S Bixel St
Los Angeles, CA 90017

Ruben Chavez
2249 Johnston St
Los Angeles, CA 90031

Heidi L. Acosta Morteo
Principal
Cesar Chavez Elementary School
5243 Oakland St
Los Angeles, CA 90032

Elizabeth Bakey
4363 Maycrest Ave
Los Angeles, CA 90032

Ana Caudillo
Assistant to the President
Cal State Los Angeles
5151 State University Dr
Los Angeles, CA 90032

Jesse Chelerta
4359 Maycrest Ave
Los Angeles, CA 90032

Luis Cuevas
Principal
Sierra Vista Elementary School
4342 Alpha St
Los Angeles, CA 90032

Maria Freese
Principal
Sierra Park Elementary School
3170 Budau Ave
Los Angeles, CA 90032

Everardo Garcia
3227 Lowell Ave
Los Angeles, CA 90032

Francis Gipson
Principal
El Sereno Middle School
2839 N Eastern Ave
Los Angeles, CA 90032

Zenay Loera
District Director
LA-32 Neighborhood Council (El Sereno)
4927 Huntington Dr N Ste 100
Los Angeles, CA 90032

Jorge Martinez
3412 Lowell Ave
Los Angeles, CA 90032

Hector Martinez
5476 Keats St
Los Angeles, CA 90032

Cheryla Morelan
Principal
El Sereno Elementary School
3838 Rosemead Ave
Los Angeles, CA 90032

S. Okano
5500 Atlas St
Los Angeles, CA 90032

Roxy Ortiz
4766 Templeton St
Los Angeles, CA 90032

Carlos Preciado
5506 Poplar Blvd
Los Angeles, CA 90032

Rosalha Rai
3815 Sheffield Ave
Los Angeles, CA 90032

Oscar Rodriguez
5512 Atlas St
Los Angeles, CA 90032

Victoria Sandoval and Robert Ahumada
4426 Maycrest Ave
Los Angeles, CA 90032

El Sereno Senior Center
4818 Klamath Pl
Los Angeles, CA 90032

Rocio Hernandez
Boyle Heights Area Director
Boyle Heights Neighborhood Council
2130 E 1st St Ste 241
Los Angeles, CA 90033

Boyle Heights Senior Center
2839 E 3rd St
Los Angeles, CA 90033

Don Justin
1636 Fair Park Ave
Los Angeles, CA 90041

R.M. Reynolds
Club President
Northeast La Rotary Club
4604 Eagle Rock Blvd
Los Angeles, CA 90041

Highland Park Senior Center
6152 N Figueroa St
Los Angeles, CA 90042

Maria Carr
1348 W 58th Pl
Los Angeles, CA 90044

Monica Alcaez
Board President
Historic Highland Park Neighborhood Council
PO Box 50791
Los Angeles, CA 90050

Omar Perez
3409 Ellison St
Los Angeles, CA 90063

Ramona Hall Community Center
4580 N Figueroa St
Los Angeles, CA 90065

Tim O'Connel
Senior Director Policy & Advocacy
Century Housing
1000 Corporate Pointe
Culver City, CA 90230

Veronica Garcia
Habitat For Humanity
8739 Artesia Blvd
Bellflower, CA 90706

Richard Sigler
1804 Marina Dr
San Pedro, CA 90732

Patricia Cunliffe
3010 Highview Ave
Altadena, CA 91001

Joe Parlcer
2542 El Doi Ave
Altadena, CA 91001

Virginia Kennedy
PO Box 662
Sierra Madre, CA 91025

Janet Anderson
Principal
South Pasadena High School
1401 Fremont Ave
South Pasadena, CA 91030

Joe & Melanie Ciccone
1001 Buena Vista St
South Pasadena, CA 91030

Bruce Crum
President
South Pasadena Kiwanis Club
1107 Fair Oaks Ave Box 74
South Pasadena, CA 91030

Carol Duley
1110 Stratford Ave
South Pasadena, CA 91030

James Frawley
Fire Chief
South Pasadena Fire Department
817 Mound Ave
South Pasadena, CA 91030

Sergio Gonzalez
City Manager
City of South Pasadena
1414 Mission St
South Pasadena, CA 91030

David Kubela
South Pasadena Middle School
1500 Fair Oaks Ave
South Pasadena, CA 91030

Nancy Lavelle
President
Institute For The Redesign of
Learning
1955 Fremont Ave
South Pasadena, CA 91030

Margaret Lin
Principal Management Analyst
City of South Pasadena
1414 Mission St
South Pasadena, CA 91030

Emilia Lomeli
2018 Alpha St
South Pasadena, CA 91030

Diana Mahmud
1602 Camden Pkwy
South Pasadena, CA 91030

John Mayer
Staff Liaison
South Pasadena Cultural Heritage
Association
1424 Mission St
South Pasadena, CA 91030

Rev. Dr. Rex McDaniel
Pastor
Calvary Presbyterian Church
1050 Fremont Ave
South Pasadena, CA 91030

Fred Minagar
City Traffic Engineer
City of South Pasadena
1414 Mission St
South Pasadena, CA 91030

Laurie Narro
Principal
Monterey Hills Elementary School
1624 Via Del Rey
South Pasadena, CA 91030

Rev. Jose Parathanal
Priest Minister
Holy Family Catholic Church
1527 Fremont Ave
South Pasadena, CA 91030

Debora Parks
1015 Columbia St
South Pasadena, CA 91030

Camilo Regalado
1722 Gillette Crst
South Pasadena, CA 91030

George Sarosi
717 Bonita Dr
South Pasadena, CA 91030

Paul Toor
Director Of Public Works
City of South Pasadena
1414 Mission St
South Pasadena, CA 91030

Liliana Torres Senior Center Supervisor South Pasadena Senior Center 1102 Oxley St South Pasadena, CA 91030	David Watkins Planning and Building Director South Pasadena Planning Commission 1424 Mission St South Pasadena, CA 91030	Geoff Yantz Superintendent South Pasadena Unified School District 1020 El Centro St South Pasadena, CA 91030
Malia Zaman 1800 State St Apt 84 South Pasadena, CA 91030	Kharen Zeunert 852 Monterey Rd South Pasadena, CA 91030	SNF South Pasadena Convalescent 904 Mission St South Pasadena, CA 91030
South Pasadena Chinese Church 920 Fremont Ave South Pasadena, CA 91030	South Pasadena Christian Church 1316 Lyndon St South Pasadena, CA 91030	South Pasadena Preservation 913 Meridian Ave South Pasadena, CA 91030
South Pasadena YMCA 1605 Garfield Ave South Pasadena, CA 91030	St. James Episcopal Church 1325 Monterey Rd South Pasadena, CA 91030	St. James Parish Day School 1325 Monterey Rd South Pasadena, CA 91030
Mike And Maria Cheikosman PO Box 3398 South Pasadena, CA 91031	Scott Feldman President South Pasadena Chamber of Commerce PO Box 3446 South Pasadena, CA 91031	Rick Larkin Club President South Pasadena Rotary Club PO Box 362 South Pasadena, CA 91031
Michael J. Beck City Manager City of Pasadena 100 N Garfield Ave Rm S-228 Pasadena, CA 91101	Julie Gutierrez Director of Public Works City of Pasadena 100 N Garfield Ave 306 Pasadena, CA 91101	Brooke Larsen Garlock President Pasadena Beautiful Foundation 140 S Lake Ave Ste 218 Pasadena, CA 91101
Joaquin Siques Transportation Engineer City of Pasadena 100 N Garfield Ave 306 Pasadena, CA 91101	Bertral Washington Fire Chief Pasadena Fire Department 215 N Marengo Ave Ste 195 Pasadena, CA 91101	Kim Yamasaki Assistant Executive Director Center For Asian Americans United For Self Empowerment 260 S Los Robles Ave Pasadena, CA 91101
Pat Riley President Pasadena Host Lions Club PO Box 364 Pasadena, CA 91102	Anthony Guthmiller Executive Director Aids Service Center 65 N Raymond Ave Pasadena, CA 91103	Heritage Housing 608 N Fair Oaks Ave Unit 126 Pasadena, CA 91103
Dr. Ezat Parnia Office Of The President Pacific Oaks College 55 Eureka St Pasadena, CA 91103	James Wong Project Manager City of Pasadena Housing Department 649 N Fair Oaks Ave Ste 202 Pasadena, CA 91103	Pasadena Senior Center 85 E Holly St Pasadena, CA 91103

Rikke Alderson
929 S Pasadena Ave
Pasadena, CA 91105

Thomas Aylesburg
President
Los Angeles College of Music
300 S Fair Oaks Ave
Pasadena, CA 91105

Claire Bogaard
311 Congress Pl
Pasadena, CA 91105

Lynn Bryan
726 S Saint John Ave
Pasadena, CA 91105

Lisa Dulyea
Director of Communications
Mayfield Senior School
500 Bellefontaine St
Pasadena, CA 91105

Gloria Henderson
440 Elmwood Dr
Pasadena, CA 91105

Amy Hsu
412 Gordon Ter
Pasadena, CA 91105

Jesse Lattig
Preservation Director
Pasadena Heritage
651 S Saint John Ave
Pasadena, CA 91105

Brian McDonald
Superintendent
Pasadena Unified School District
200 Allendale Rd
Pasadena, CA 91105

Sue Mossman
Executive Director
Pasadena Heritage
651 S Saint John Ave
Pasadena, CA 91105

Frank Nicholos
Club President
Pasadena Rotary Club
556 S Fair Oaks Ave Ste 101 # 379
Pasadena, CA 91105

Jim Noble
President
Huntington Hospital
100 W California Blvd
Pasadena, CA 91105

Joanne Nuckols
1531 Ramon Ave
Pasadena, CA 91105

Attn: Ewa Nyczak
Pasadena Mansion
779 S Pasadena Ave
Pasadena, CA 91105

Elena Phleger
Director of Development and
Communications
Sequoyah School
535 Pasadena Ave.
Pasadena, CA 91105

Willie Romero
737 S Pasadena Ave
Pasadena, CA 91105

Evelyn Sagastume
Owner
Raymond Avenue Veterinary
Hospital
959 S Raymond Ave
Pasadena, CA 91105

Christopher Sutton
Attorney
Law office of Christopher Sutton
586 La Loma Rd
Pasadena, CA 91105

Janice Toebben
418 Gordon Ter
Pasadena, CA 91105

Holly Wang
MD
Kindercare Pediatrics
50 Alessandro Pl
Pasadena, CA 91105

American Red Cross
430 Madeline Dr
Pasadena, CA 91105

Norton Simon Museum
411 W Colorado Blvd
Pasadena, CA 91105

Pacific Oaks Children'S School
714 W California Blvd
Pasadena, CA 91105

Pasadena Community Christian
Fellowship
500 S Pasadena Ave
Pasadena, CA 91105

Westridge School
324 Madeline Dr
Pasadena, CA 91105

Paul Little
President
Pasadena Chamber of Commerce
44 N Mentor Ave
Pasadena, CA 91106

Mitch Dorger
Executive Director
Pasadena Boys & Girls Club
3230 E Del Mar Blvd
Pasadena, CA 91107

Mic Hensen
District 6 Planning Commission
Member
Pasadena Planning Commission
175 N. Garfield Ave Hale Bldg
Pasadena, CA 91109

Tim Peters
Executive Director
Door of Hope
PO Box 90455
Pasadena, CA 91109

Paulina Rivera
Staff Representative
Pasadena Planning Commission
175 N. Garfield Ave Hale Bldg
Pasadena, CA 91109

Craig Wallace
Pasadena Kiwanis Club
PO Box 50484
Pasadena, CA 91115

Dale Travis
208 W San Gabriel Pl
Azusa, CA 91702

Kathy Barbata
1505 E Dexter St
Covina, CA 91724

Ron Eaton
Prospect Mortgage
9680 Haven Ave Ste 350
Rancho Cucamonga, CA 91730

Ronald Lozano
2428 Puata Del Est
Hacienda Heights, CA 91745

Victor Acuna
890 Brightwood St Apt 5
Monterey Park, CA 91754

Daniel Johnson
1001 Monterey Pass Rd
Monterey Park, CA 91754

Carol Baca
Director
South Pasadena Royal Lions Club
500 W Main St
Alhambra, CA 91801

Yvonne Barrios
Planning Commission Secretary
City of Alhambra Planning
Commission
111 S 1st St
Alhambra, CA 91801

Eva Carrillo
429 N Bushnell Ave
Alhambra, CA 91801

Maria Castillo
1105 S Valencia St
Alhambra, CA 91801

Mary Chavez
Director of Public Works
City of Alhambra
111 S 1st St
Alhambra, CA 91801

Leland C. Dolley
City of Alhambra
111 S 1st St
Alhambra, CA 91801

Daniel Farras
City of Alhambra
111 S 1st St
Alhambra, CA 91801

Sharon Gibbs
Executive Director
Alhambra Chamber of Commerce
104 S 1st St
Alhambra, CA 91801

Cynthia Li
Club President
Alhambra Lions Club
500 W Main St
Alhambra, CA 91801

Jose Prado
301 S Granada Ave
Alhambra, CA 91801

Mary Swink
City Manager
City of Alhambra
111 S 1st St
Alhambra, CA 91801

Bill Walker
Fire Chief
Alhambra Fire Department
301 N 1st St
Alhambra, CA 91801

Dr. WenShuo Wu
Vice President
Alhambra Medical University
55 S Raymond Ave Ste 105
Alhambra, CA 91801

Carmen Hernandez
Club President
Alhambra Rotary Club
PO Box 142
Alhambra, CA 91802

Brooke Archill
Admission Director
Pinnacle College
1000 S Fremont Ave A11010
Alhambra, CA 91803

Linda Marsh
Senior Executive Vice President
AHMC Healthcare Center
1000 S Fremont Ave Bldg A-9 6 FL
Alhambra, CA 91803

Ignacio Muniz
Principal
Fremont Elementary School
2001 Elm St
Alhambra, CA 91803

Robert Paul
 President
 Devry University Alhambra
 1000 D Fremont Ave Unit 100, Blg-
 A-11
 Alhambra, CA 91803

David Reynolds
 Principal
 Emery Park Elementary
 2821 W Commonwealth Ave
 Alhambra, CA 91803

Laura Tellez-Gagliana
 Superintendent
 Alhambra Unified School District
 1515 W Mission Rd
 Alhambra, CA 91803

Dr. Peter Woo
 President
 California American University
 1000 S Fremont Ave Unit 29
 Alhambra, CA 91803

Platt College
 1000 S Fremont Ave Ste A9W
 Alhambra, CA 91803

Cynthia A. Parker
 President & CEO
 Bridge Housing
 20321 Irvine Ave Ste F1
 Newport Beach, CA 92660

Olivia Blanco
 Association of Regional Center
 Agencies (ARCA)
 915 L St Ste 1440
 Sacramento, CA 95814

Natalia Bacchus
 926 Jane Pl
 Pasadena, CA 91105

Robert and Linda Cole
 PO Box 1024
 Studio City, CA 91614

Vincent N. Unpingco
 4074 Alabama St
 San Diego, CA 92104

Mark Ng
 3533 Chadwick Dr
 Los Angeles, CA 90032

Claire W. Bogaard
 NO 710 Action Committee
 C/O 581 Garden Lane
 Pasadena, CA 91105

Elizabeth S. Merritt
 Deputy General Counsel
 National Trust for Historic
 Preservation
 2600 Virginia Ave, NW, Suite 1100
 Washington, DC 20037

Tom Williams
 4117 Barrett Rd
 Los Angeles, CA 90032

Christopher Sutton
 586 La Loma Rd
 Pasadena, CA 91105-2443

Adrian Scott Fine
 Director of Advocacy
 Los Angeles Conservancy
 523 West Sixth St, Suite 826
 Los Angeles, CA 90014

8.4 Elected Officials

The Honorable Michael Antonovich
 Los Angeles County Supervisor, Dist. 5
 Los Angeles County Board of
 Supervisors
 500 W Temple St
 Los Angeles, CA 90012

The Honorable Barbara Boxer
 US Senator
 United States Senate
 312 N Spring St Ste 1748
 Los Angeles, CA 90012

The Honorable Eric Garcetti
 Mayor
 City of Los Angeles
 200 N Spring St
 Los Angeles, CA 90012

The Honorable Jose Huizar
 Councilmember, Dist. 14
 City of Los Angeles
 200 N Spring St Ste 465
 Los Angeles, CA 90012

The Honorable Hilda Solis
 Los Angeles County Supervisor, Dist. 1
 Los Angeles County Board of
 Supervisors
 500 W Temple St
 Los Angeles, CA 90012

The Honorable Xavier Becerra
 US Representative, Dist. 34
 US House of Representatives
 350 S Bixel St Ste 120
 Los Angeles, CA 90017

The Honorable Diane Feinstein
US Senator
United States Senate
11111 Santa Monica Blvd Ste 915
Los Angeles, CA 90025

The Honorable Kevin DeLeon
California State Senator, Dist. 24
California State Senate
1808 W Sunset Blvd
Los Angeles, CA 90026

The Honorable Jimmy Gomez
California Assemblymember, Dist. 51
California State Assembly
1910 W Sunset Blvd Ste 810
Los Angeles, CA 90026

The Honorable Lucille Roybal-Allard
US Representative, Dist. 40
US House of Representatives
500 Citadel Dr Ste 320
Commerce, CA 90040

The Honorable Michael A. Cacciotti
Councilmember
City of South Pasadena
1414 Mission St
South Pasadena, CA 91030

The Honorable Robert S. Joe
Mayor
City of South Pasadena
1414 Mission St
South Pasadena, CA 91030

The Honorable Marina Khubesrian
Councilmember
City of South Pasadena
1414 Mission St
South Pasadena, CA 91030

The Honorable Diana Mahmud
Mayor Pro Tem
City of South Pasadena
1414 Mission St
South Pasadena, CA 91030

The Honorable Richard D. Schneider
Councilmember
City of South Pasadena
1414 Mission St
South Pasadena, CA 91030

The Honorable Bill Bogaard
Mayor
City of Pasadena
100 N Garfield Ave Rm S-228
Pasadena, CA 91101

The Honorable Judy Chu
US Representative, Dist. 27
US House of Representatives
527 S Lake Ave Ste 106
Pasadena, CA 91101

The Honorable Steve Madison
Councilmember, Dist. 6
City of Pasadena
100 N Garfield Ave Rm S-228
Pasadena, CA 91101

The Honorable Jacque Robinson
Councilmember, District 1
City of Pasadena
100 N Garfield Ave Rm S-228
Pasadena, CA 91101

The Honorable Chris Holden
California Assemblymember, Dist. 41
California State Assembly
600 N Rosemead Blvd Ste 117
Pasadena, CA 91107

The Honorable Carol Liu
California State Senator, Dist. 25
California State Senate
1000 N Central Ave Ste 240
Glendale, CA 91202

The Honorable Mike Gatto
California Assemblymember, Dist. 43
California State Assembly
300 E Magnolia Blvd Ste 504
Burbank, CA 91502

The Honorable Adam Schiff
Congressmember, Dist. 28
US House of Representatives
245 E Olive Ave Ste 200
Burbank, CA 91502

The Honorable Ed Chau
California Assemblymember, Dist. 49
California State Assembly
1255 Corporate Center Dr Ste 306
Monterey Park, CA 91754

The Honorable Ed Hernandez
California State Senator, Dist. 22
California State Senate
100 S Vincent Ave Ste 401
West Covina, CA 91790

The Honorable Luis Ayala
Vice Mayor, Dist. 5
City of Alhambra
111 S 1st St
Alhambra, CA 91801

The Honorable Barbara Messina
Councilmember, Dist. 2
City of Alhambra
111 S 1st St
Alhambra, CA 91801

The Honorable Steven Placido
Councilmember, Dist. 4
City of Alhambra
111 S 1st St
Alhambra, CA 91801

The Honorable Stephen Sham
Councilmember, Dist. 1
City of Alhambra
111 S 1st St
Alhambra, CA 91801

The Honorable Gary Yamauchi
Mayor, Dist. 3
City of Alhambra
111 S 1st St
Alhambra, CA 91801

8.5 Libraries

Eugene Estrada
Senior Librarian
Los Angeles Public Library - El
Serenio Branch
5226 Huntington Dr S
Los Angeles, CA 90032

South Pasadena Public Library
1100 Oxley St
South Pasadena, CA 91030

Pasadena Public Library - Central
Library
285 E Walnut St
Pasadena, CA 91101

Pasadena Public Library - Villa
Parke Branch
363 E Villa St
Pasadena, CA 91101

Pasadena Public Library - Allendale
Branch
1130 S Marengo Ave
Pasadena, CA 91106

Alhambra Civic Center Library
101 S 1st St
Alhambra, CA 91801

This page intentionally left blank

Chapter 9 Document Preparation Team

9.1 Lead Agency

9.1.1 California Department of Transportation, District 7

Ron Kosinski, Deputy District Director, Division of Environmental Planning

Garrett Damrath, Chief Environmental Planner

Allison Morrow, Senior Environmental Planner

Lourdes Ortega, Associate Environmental Planner

Jason Roach, Associate Environmental Planner

Kelly Ewing-Toledo, Senior Environmental Planner, Cultural Resources Branch

Claudia Harbert, Associate Environmental Planner, Principal Architectural Historian

Paul Caron, Senior District Biologist

Samer Momani, Associate Environmental Planner

Gustavo Ortega, Senior Engineering Geologist

Andrew Yoon, P.E., Senior Transportation Engineer, Air Quality Branch and
Hazardous Waste Branch

Upa Patel, Transportation Engineer, Hazardous Waste

Jin S. Lee, P.E., PMP, Branch Chief, Noise & Vibration Branch

Andrew Nierenberg, Deputy District Director, Division of Right of Way

Kimberly Erickson, Senior Right of Way Agent, Relocation Impact Report

Jeffery Newman, Associate Right of Way Agent

Patty Watanabe, Senior Landscape Architect, Visual Impact Assessment

Dahlia Persoff, Landscape Architect, Visual Impact Assessment

Derek Higa, Senior Transportation Engineer, Design

Kaz Kayoda, Transportation Engineer, Design

John K. Lee, Project Manager

9.2 Consultants to Lead Agency

9.2.1 LSA Associates, Inc.

Deborah Pracilio, Principal, Environmental Task Manager

King Thomas, SR 710 Surplus Property Project Manager

Ryan Bensley, Senior Environmental Planner

Beverly Inloes, Lead Technical Editor/Word Processor

Janet Danker, Assistant Environmental Planner

Hilary Haskell, Assistant Environmental Planner

Jade Dean, GIS Specialist

Jennette Crockett, Technical Editor/Word Processor

Lauren Johnson, Technical Editor

Chantik Virgil, Word Processor

9.2.2 Tierra West Advisors

John Yonai, Principal, Chairman

Rose Yonai, Principal, Chief Executive Officer

Appendix A Senate Bill 416

This page intentionally left blank

Senate Bill No. 416

CHAPTER 468

An act to amend Sections 54236 and 54237 of, and to add Sections 54237.3, 54237.7, and 54237.8 to, the Government Code, relating to surplus residential property, and making an appropriation therefor.

[Approved by Governor October 1, 2013. Filed with
Secretary of State October 1, 2013.]

LEGISLATIVE COUNSEL'S DIGEST

SB 416, Liu. Surplus residential property.

Existing law declares the intent of the Legislature to preserve, upgrade, and expand the supply of housing to persons and families of low or moderate income, through the sale of specified surplus residential property owned by public agencies. Existing law establishes priorities and procedures that any state agency disposing of that surplus residential property is required to follow, and defines relevant terms for these purposes, including "fair market value."

This bill would revise the definition of "fair market value" for purposes of the sale of this surplus residential property, to reflect the existing "as is" condition of the property, taking into account any needed repairs.

Existing law requires specified single-family residences to be first offered to their present occupants, at an affordable price, as defined. Under existing law, the selling agency has the option of making repairs to the property required by lenders or government assistance programs, or providing the occupants with a replacement dwelling, pursuant to a specified provision of law.

This bill would revise the procedures applicable to the sale of these surplus residential properties not otherwise sold pursuant to existing procedures, to be offered to current and former tenants in good standing, respectively, and to purchasers who will be owner occupants. The bill additionally would require the selling agency to offer tenants in good standing of nonresidential properties to be given priority to purchase the property they occupy. The bill would authorize the Department of Transportation to offer a residence or property in an "as is" condition, at the request of a person with priority to purchase the residence or property in accordance with existing law.

This bill would require proceeds from sales of surplus residential property to be placed in the SR-710 Rehabilitation Account, created by the bill, and would continuously appropriate these funds for the purpose of providing specified repairs to the properties until the last of the properties is repaired, at which time the funds, less any reimbursements due to the federal government, would be transferred to the State Highway Account, for allocation by the California Transportation Commission, as specified.

This bill would provide that the preliminary project alternative referred to as Alternative F-6 in the December 2012 Alternative Analysis Report of the Los Angeles Metropolitan Transportation Authority shall no longer be deemed a feasible alternative for consideration in any state environmental review process for the Interstate 710 North Gap Closure project, as specified.

Appropriation: yes.

The people of the State of California do enact as follows:

SECTION 1. Section 54236 of the Government Code is amended to read:

54236. (a) As used in this article, the term “offer” means to solicit proposals prior to sale in a manner calculated to achieve a sale under the conditions specified, and to hold the offer open for a reasonable period of time, which shall be no more than one year, unless the time is extended by the selling agency at its discretion, for a period to be specified by the selling agency.

(b) As used in this article, the term “affordable price” means, in the case of a purchaser, other than a lower income household, the price for residential property for which the purchaser’s monthly payments will not exceed that portion of the purchasing household’s adjusted income as determined in accordance with the regulations of the United States Department of Housing and Urban Development, issued pursuant to Section 235 of the National Housing Act; and, in the case of a purchaser that is a lower income household, the price for residential property for which the purchaser’s monthly payments will not exceed that portion of the purchasing household’s adjusted income as determined in accordance with the regulations of the United States Department of Housing and Urban Development issued pursuant to Section 8 of the United States Housing Act of 1937.

(c) As used in this article, the term “single-family residence” means a real property improvement used, or intended to be used, as a dwelling unit for one family.

(d) As used in this article, the term “surplus residential property” means land and structures owned by any agency of the state that is determined to be no longer necessary for the agency’s use, and that is developed as single-family or multifamily housing, except property being held by the agency for the purpose of exchange.

Surplus residential properties shall only include land and structures that, at the time of purchase by the state, the state had intended to remove the residences thereon and to use the land for state purposes.

(e) As used in this article, the term “displacement” includes, but is not limited to, persons who will have to move from surplus residential property that they occupy when it is sold by a state agency because they are unable to afford to pay the price that the state agency is asking for the residential property.

(f) As used in this article, the term “fair market value” shall mean fair market value as of the date the offer of sale is made by the selling agency pursuant to the provisions of this article and shall reflect the existing “as is” condition of the property, taking into account any repairs required to make the property safe and habitable. This definition shall not apply to terms of sale that are described as mitigation measures in an environmental study prepared pursuant to the Public Resources Code if the study was initiated before this measure was enacted.

(g) As used in this article, the term “affordable rent” means, in the case of an occupant person or family, other than a person or family of low or moderate income, rent for residential property that is not more than 25 percent of the occupant household’s gross monthly income, and in the case of an occupant person or family of low or moderate income, rent for residential property that is not more than the percentage of the adjusted income of the occupant person or family as permitted under regulations of the United States Department of Housing and Urban Development issued pursuant to Section 8 of the United States Housing Act of 1937, but not in excess of the market rental value for comparable property.

(h) As used in this article, the term “area median income” means median household income, adjusted for family size as determined in accordance with the regulations of the United States Department of Housing and Urban Development issued pursuant to Section 235 of the National Housing Act, as amended (Public Law 90-448), for the standard metropolitan statistical area (SMSA), in which surplus residential property to be disposed of pursuant to this article is located, or the county in which the property is located, if it is outside an SMSA.

(i) As used in this article, the term “persons and families of low or moderate income” means persons and families who meet both of the following conditions:

(1) Meet the definition of persons and families of low or moderate income set forth in Section 50093 of the Health and Safety Code.

(2) Have not had an ownership interest in real property in the last three years.

(j) As used in this article, the term “lower income households” means lower income households as defined in Section 50079.5 of the Health and Safety Code.

SEC. 2. Section 54237 of the Government Code is amended to read:

54237. (a) Notwithstanding Section 11011.1, any agency of the state disposing of surplus residential property shall do so in accordance with the following priorities and procedures:

(1) First, all single-family residences presently occupied by their former owners shall be offered to those former owners at the appraised fair market value.

(2) Second, all single-family residences shall be offered, pursuant to this article, to their present occupants who have occupied the property two years or more and who are persons and families of low or moderate income.

(3) Third, all single-family residences shall be offered, pursuant to this article, to their present occupants who have occupied the property five years or more and whose household income does not exceed 150 percent of the area median income.

(4) Fourth, a single-family residence shall not be offered, pursuant to this article, to present occupants who are not the former owners of the property if the present occupants have had an ownership interest in real property in the last three years.

(b) Single-family residences offered to their present occupants pursuant to paragraphs (2) and (3) of subdivision (a) shall be offered to those present occupants at an affordable price, which price shall not be less than the price paid by the agency for original acquisition, unless the acquisition price was greater than the current fair market value, and shall not be greater than fair market value. When single-family residences are offered to present occupants at a price that is less than fair market value, the selling agency shall impose terms, conditions, and restrictions to ensure that the housing will remain available to persons and families of low or moderate income and households with incomes no greater than the incomes of the present occupants in proportion to the area median income. The Department of Housing and Community Development shall provide to the selling agency recommendations of standards and criteria for these prices, terms, conditions, and restrictions. The selling agency shall provide repairs required by lenders and government housing assistance programs, or, at the option of the agency, provide the present occupants with a replacement dwelling pursuant to Section 54237.5.

(c) If single-family residences are offered to their present occupants pursuant to paragraphs (2) and (3) of subdivision (a), the occupants shall certify their income and assets to the selling agency. When single-family residences are offered to present occupants at a price that is less than fair market value, the selling agency may verify the certifications, in accordance with procedures utilized for verification of incomes of purchasers and occupants of housing financed by the California Housing Finance Agency and with regulations adopted for the verification of assets by the United States Department of Housing and Urban Development. The income and asset limitations and term of residency requirements of paragraphs (2) and (3) of subdivision (a) shall not apply to sales that are described as mitigation measures in an environmental study prepared pursuant to the Public Resources Code, if the study was initiated before this measure was enacted.

(d) All other surplus residential properties and all properties described in paragraphs (1), (2), and (3) of subdivision (a) that are not purchased by the former owners or the present occupants shall be then offered to housing-related private and public entities at a reasonable price, which is best suited to economically feasible use of the property as decent, safe, and sanitary housing at affordable rents and affordable prices for persons and families of low or moderate income, on the condition that the purchasing entity shall cause the property to be rehabilitated and developed as limited equity cooperative housing with first right of occupancy to present occupants,

except that where the development of cooperative or cooperatives is not feasible, the purchasing agency shall cause the property to be used for low and moderate income rental or owner-occupied housing, with first right of occupancy to the present tenants. The price of the property in no case shall be less than the price paid by the agency for original acquisition unless the acquisition price was greater than current fair market value and shall not be greater than fair market value. Subject to the foregoing, it shall be set at the level necessary to provide housing at affordable rents and affordable prices for present tenants and persons and families of low or moderate income. When residential property is offered at a price that is less than fair market value, the selling agency shall impose terms, conditions, and restrictions as will ensure that the housing will remain available to persons and families of low or moderate income. The Department of Housing and Community Development shall provide to the selling agency recommendations of standards and criteria for prices, terms, conditions, and restrictions.

(e) Any surplus residential properties not sold pursuant to subdivisions (a) to (d), inclusive, shall then be sold at fair market value, with priority given first to purchasers who are present tenants in good standing with all rent obligations current and paid in full, second to former tenants who were in good standing at the time they vacated the premises, with priority given to the most recent tenants first, and then to purchasers who will be owner occupants. The selling agency may commence the sales of properties that former tenants may possess a right to purchase as provided by this subdivision 30 days after the selling agency has done both of the following:

- (1) Posted information regarding the sales under this subdivision on the selling agency's Internet Web site.
- (2) Made a good faith effort to provide written notice, by first-class mail, to the last known address of each former tenant.

(f) Tenants in good standing of nonresidential properties shall be given priority to purchase, at fair market value, the property they rent, lease, or otherwise legally occupy.

SEC. 3. Section 54237.3 is added to the Government Code, to read:

54237.3. Notwithstanding the requirement to provide repairs in subdivision (b) of Section 54237, the Department of Transportation may offer a residence or property in an "as is" condition at the request of a person given priority to purchase pursuant to paragraphs (2) and (3) of subdivision (a) of Section 54237.

SEC. 4. Section 54237.7 is added to the Government Code, to read:

54237.7. Notwithstanding Section 183.1 of the Streets and Highways Code, the Department of Transportation shall deposit proceeds from sales pursuant to this article into the SR-710 Rehabilitation Account, which is hereby created. Notwithstanding Section 13340, funds in the account are hereby continuously appropriated to the department without regard to fiscal years for the purpose of providing repairs required pursuant to subdivision (b) of Section 54237. The total funds maintained in the account shall not exceed five hundred thousand dollars (\$500,000). Funds exceeding that amount, less any reimbursements due to the federal government, shall be

transferred to the State Highway Account in the State Transportation Fund to be used for allocation by the California Transportation Commission (commission) exclusively to fund projects located in Pasadena, South Pasadena, Alhambra, La Cañada Flintridge, and the 90032 postal ZIP Code. Projects shall be selected and prioritized by the affected communities in consultation with the Los Angeles County Metropolitan Transportation Authority, pursuant to guidelines developed by the commission. The Los Angeles Metropolitan Transportation Authority shall submit a proposed program of projects and the commission shall have final authority to approve the projects. Eligible projects may include, but are not limited to: sound walls; transit and rail capital improvements; bikeways; pedestrian improvements; signal synchronization; left turn signals; and major street resurfacing, rehabilitation, and reconstruction. The funds shall not be used to advance or construct any proposed North State Route 710 tunnel. Any funds remaining in the SR-710 Rehabilitation Account on the date that final payment due for the last of the properties repaired has been made, less any reimbursements due to the federal government, shall be transferred to the State Highway Account in the State Transportation Fund, to be used exclusively for the purposes described in this section.

SEC. 5. Section 54237.8 is added to the Government Code, to read:

54237.8. Notwithstanding any other law, for purposes of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code), the preliminary project alternative referred to as Alternative F-6 in the December 2012 Alternative Analysis Report of the Los Angeles Metropolitan Transportation Authority shall no longer be deemed a feasible alternative for consideration in any state environmental review process for the Interstate 710 North Gap Closure project, State Clearinghouse number 1982092310.

Appendix B Government Code 54235-
54238.7 (Roberti Bill)

This page intentionally left blank

GOVERNMENT CODE

SECTION 54235-54238.7

54235. The Legislature reaffirms its finding that the disposition of surplus property owned by public agencies should be utilized to further state policies.

The Legislature reaffirms its finding that there exists within the urban and rural areas of the state a serious shortage of decent, safe, and sanitary housing which persons and families of low or moderate income can afford, and consequently a pressing and urgent need for the preservation and expansion of the low- and moderate-income housing supply. The Legislature further reaffirms its finding that highway and other state activities have contributed to the severe shortage of such housing. The Legislature reaffirms that the provision of decent housing for all Californians is a state goal of the highest priority. The Legislature finds and declares that actions of state agencies including the sales of surplus residential properties which result in the loss of decent and affordable housing for persons and families of low or moderate income is contrary to state housing, urban development, and environmental policies and is a significant environmental effect, within the meaning of Article XIX of the California Constitution, which will be mitigated by the sale of surplus residential property pursuant to the provisions of this article.

The Legislature further finds and declares that the displacement of large numbers of persons as a result of the sale of surplus residential property owned by agencies of the state is a significant environmental effect, within the meaning of Article XIX of the California Constitution which will be mitigated by sale of such properties pursuant to the provisions of this article.

The Legislature further finds and declares that the sale of surplus residential property pursuant to the provisions of this article will directly serve an important public purpose. Wherefore, the Legislature intends by this article to preserve, upgrade and expand the supply of housing available to persons and families of low or moderate income. The Legislature further intends by this article to mitigate the environmental effects, within the meaning of Article XIX, of the California Constitution, caused by highway activities.

54236. (a) As used in this article, the term "offer" means to solicit proposals prior to sale in a manner calculated to achieve a sale under the conditions specified, and to hold such offer open for a reasonable period of time, which shall be no more than one year, unless such time is extended by the selling agency at its discretion, for a period to be specified by the selling agency.

(b) As used in this article, the term "affordable price" means, in the case of a purchaser, other than a lower income household, the price for residential property for which the purchaser's monthly payments will not exceed that portion of the purchasing household's adjusted income as determined in accordance with the regulations of the United States Department of Housing and Urban Development, issued

pursuant to Section 235 of the National Housing Act; and, in the case of a purchaser that is a lower income household, the price for residential property for which the purchaser's monthly payments will not exceed that portion of the purchasing household's adjusted income as determined in accordance with the regulations of the United States Department of Housing and Urban Development issued pursuant to Section 8 of the United States Housing Act of 1937.

(c) As used in this article, the term "single-family residence" means a real property improvement used, or intended to be used, as a dwelling unit for one family.

(d) As used in this article, the term "surplus residential property" means land and structures owned by any agency of the state that is determined to be no longer necessary for such agency's use, and which is developed as single-family or multi-family housing, except property being held by the agency for the purpose of exchange.

Surplus residential properties shall only include land and structures which, at the time of purchase by the state, the state had intended to remove the residences thereon and to use the land for state purposes.

(e) As used in this article the term "displacement" includes, but is not limited to, persons who will have to move from surplus residential property that they occupy when it is sold by a state agency because they are unable to afford to pay the price which the state agency is asking for the residential property.

(f) As used in this article, the term "fair market value" shall mean fair market value as of the date the offer of sale is made by the selling agency pursuant to the provisions of this article. This definition shall not apply to terms of sale that are described as mitigation measures in an environmental study prepared pursuant to the Public Resources Code if such study was initiated prior to the enactment of this measure.

(g) As used in this article, the term "affordable rent" means, in the case of an occupant person or family, other than a person or family of low or moderate income, rent for residential property which is not more than 25 percent of the occupant household's gross monthly income, and in the case of an occupant person or family of low or moderate income, rent for residential property which is not more than the percentage of the adjusted income of the occupant person or family as permitted under regulations of the United States Department of Housing and Urban Development issued pursuant to Section 8 of the United States Housing Act of 1937, but not in excess of the market rental value for comparable property.

(h) As used in this article, the term "area median income" means median household income, adjusted for family size as determined in accordance with the regulations of the United States Department of Housing and Urban Development issued pursuant to Section 235 of the National Housing Act, as amended (P.L. 90-448), for the Standard Metropolitan Statistical Area (S.M.S.A.), in which surplus residential property to be disposed of pursuant to this article is located, or the county in which such property is located, if it is outside an S.M.S.A.

(i) As used in this article, the term "persons and families of low or moderate income" means persons and families of low or moderate income as defined by Section 50093 of the Health and Safety Code.

(j) As used in this article, the term "lower income households" means lower income households as defined in Section 50079.5 of the

Health and Safety Code.

54237. (a) Notwithstanding Section 11011.1, any agency of the state disposing of surplus residential property shall do so in accordance with the following priorities and procedures:

(1) First, all single family residences presently occupied by their former owners shall be offered to such former owners at the appraised fair market value.

(2) Second, all single-family residences shall be offered, pursuant to this article, to their present occupants who have occupied the property two years or more and who are persons and families of low or moderate income.

(3) Third, all single-family residences shall be offered, pursuant to this article, to their present occupants who have occupied the property five years or more and whose household income does not exceed 150 percent of the area median income.

(b) Single-family residences offered to their present occupants pursuant to paragraphs (2) and (3) of subdivision (a) shall be offered to such present occupants at an affordable price, which price shall not be less than the price paid by the agency for original acquisition, unless the acquisition price was greater than the current fair market value, and shall not be greater than fair market value. When such single-family residences are offered to present occupants at a price which is less than fair market value, the selling agency shall impose such terms, conditions and restrictions to assure that such housing will remain available to persons and families of low or moderate income and households with incomes no greater than the incomes of the present occupants in proportion to the area median income. The Department of Housing and Community Development shall provide to the selling agency recommendations of standards and criteria for such prices, terms, conditions and restrictions. The selling agency shall provide repairs required by lenders and government housing assistance programs, or, at the option of the agency, provide the present occupants with a replacement dwelling pursuant to Section 54237.5.

(c) If single-family residences are offered to their present occupants pursuant to paragraphs (2) and (3) of subdivision (a) the occupants shall certify their income to the selling agency. When such single-family residences are offered to present occupants at a price which is less than fair market value, the selling agency may verify such certifications, in accordance with procedures utilized for verification of incomes of purchasers and occupants of housing financed by the California Housing Finance Agency. The income limitations and term of residency requirements of paragraphs (2) and (3) of subdivision (a) shall not apply to sales that are described as mitigation measures in an environmental study prepared pursuant to the Public Resources Code, if such study was initiated prior to the enactment of this measure.

(d) All other surplus residential properties, and all properties described in paragraphs (1), (2), and (3) of subdivision (a) which are not purchased by the former owners or the present occupants shall be then offered to housing-related private and public entities at a reasonable price, which is best suited to economically feasible use of the property as decent, safe, and sanitary housing at affordable rents and affordable prices for persons and families of low or

moderate income, on the condition that the purchasing entity shall cause the property to be rehabilitated and developed as limited equity cooperative housing with first right of occupancy to present occupants, except that where the development of such cooperative or cooperatives is not feasible, the purchasing agency shall cause the property to be used for low and moderate income rental or owner-occupied housing, with first right of occupancy to the present tenants. The price of the property in no case shall be less than the price paid by the agency for original acquisition unless the acquisition price was greater than current fair market value, and shall not be greater than fair market value. Subject to the foregoing, it shall be set at the level necessary to provide housing at affordable rents and affordable prices for present tenants and persons and families of low or moderate income. When such residential property is offered at a price which is less than fair market value, the selling agency shall impose such terms, conditions and restrictions as will assure that such housing will remain available to persons and families of low or moderate income. The Department of Housing and Community Development shall provide to the selling agency recommendations of standards and criteria for such prices, terms, conditions and restrictions.

(e) Any surplus residential properties not sold pursuant to subdivisions (a) to (d), inclusive, shall then be sold at fair market value, with priority given first to purchasers who are present occupants and then to purchasers who will be owner occupants.

54237.5. Notwithstanding the requirement to provide repairs in subdivision (b) of Section 54237, the selling agency may, at its option, provide the present occupants with a replacement dwelling if all of the following conditions exist:

(a) Providing a replacement dwelling is less expensive than providing the repairs required by subdivision (b) of Section 54237.

(b) The replacement dwelling is determined to have all of the following characteristics:

(1) Is decent, safe, and sanitary.

(2) Is suitable to the occupancy needs of the household as provided under regulations of the United States Department of Housing and Urban Development issued pursuant to Section 8 of the United States Housing Act of 1937.

(3) Is open to all persons regardless of race, color, religion, sex, or national origin and consistent with requirements of Title 8 of the Civil Rights Act of 1978.

(4) Is in an area not generally less desirable than the dwelling to be acquired in regard to public utilities and public and commercial facilities.

(5) Is reasonably accessible to the displaced person's place of employment.

(6) Is in an equal or better neighborhood.

(7) Is affordable, as defined in subdivision (a) of Section 54236, to the displaced person.

(c) The offer is made at an affordable price that is not less than the price paid by the agency for original acquisition of the unit now occupied by the displaced person or the replacement unit, whichever is less, and is not more than market value.

(d) The replacement dwelling is a newly constructed or a vacant residential unit. No resident shall be displaced pursuant to Section 7260 for the purpose of creating a replacement unit.

54238. In the event a purchaser of surplus residential property does not comply with terms, conditions, and restrictions imposed pursuant to Section 54237 of this article, to assure that such housing will remain available to persons and families of low or moderate income, the state agencies which sold the property may require that the purchasers pay the state the difference between the actual price paid by the purchaser for the property and the fair market value of such property, at the time of the agency's determination of noncompliance, plus 6 percent interest on such amount for the period of time the land has been held by the purchaser. This section does not limit the right to seek injunctive relief to enforce the provisions of this article.

54238.3. (a) This article shall apply only to surplus residential properties which were acquired for a state project, for which at least 20 dwelling units were acquired and owned by the state on January 1, 1980, or on the date the properties were declared to be surplus, whichever date occurs later. For the purpose of this section, a freeway route and its interchanges shall be considered one state project. Except for State Highway Route 7 in Los Angeles County, this article shall not apply to freeway routes rescinded on or after January 1, 1984.

(b) Any person who is displaced from any dwelling located on such residential property that is also located within the right-of-way of a freeway route or its interchanges for which the property was declared surplus on or after January 1, 1984, and who occupied that dwelling for at least 90 days prior to the date the property was declared surplus, shall be eligible to receive the relocation advisory assistance provided by Section 7261, the relocation benefits provided by paragraph (1) of subdivision (a) or subdivision (b) of Section 7262, the payments authorized by subdivision (b) or (c) of Section 7264, and the right for review of decision as provided by Section 7266 if the person is forced to relocate from the dwelling, as a direct result of the state agency's disposal of the excess real property, within 90 days of the recordation of the deed from the state agency to a new owner.

(c) Whenever a state surplus residential property disposal project, as described in subdivision (b), includes 50 or more dwelling units, a Relocation Liaison shall be appointed by the Secretary of the Business, Transportation and Housing Agency. The term of the appointment shall be of sufficient duration for the Relocation Liaison to fulfill the assignment, not to exceed 180 days, and shall begin on the date that the property is declared to be surplus. The Relocation Liaison shall have the following assigned duties and responsibilities:

(1) Meet with the eligible persons and explain to them the benefits defined in subdivision (b).

(2) In conjunction with the state agency, assist in obtaining replacement housing for eligible persons.

(3) Assist eligible persons in completing and processing claims for benefits.

The state agency which is disposing of the surplus residential property shall be responsible for underwriting all reasonable costs as determined by the secretary associated with the operation of the Relocation Liaison's office necessary to perform all duties assigned to it.

54238.4. This article is intended to benefit persons and families subject to displacement and persons and families of low or moderate income. The article shall be liberally construed to permit such persons or families to enforce the rights, duties, and benefits created by the article.

54238.5. Failure to comply with the provisions of this article shall not invalidate the transfer, sale, or conveyance to a bona fide purchaser for value or an encumbrancer for value.

54238.6. If a provision of this article or the application thereof to any person or circumstances is held invalid, such invalidity shall not affect other provisions or applications of this article which can be given effect without the invalid provision or application thereof, and to this end the provisions of this article are severable.

54238.7. Except those properties the Department of Transportation is in escrow as of August 15, 1997, to sell, the Department of Transportation shall not dispose of any surplus property in the City of South Pasadena prior to January 31, 1998. The department shall report to the Legislature by December 1, 1997, on the planned disposition of any surplus property in the City of South Pasadena, the impact on the availability of housing stock, possible impacts upon the community of the proposed sale of properties, and the steps being taken to maintain the character and integrity of the neighborhoods and community.

Appendix C Title VI Policy Statement

This page intentionally left blank

DEPARTMENT OF TRANSPORTATION

OFFICE OF THE DIRECTOR
P.O. BOX 942873, MS-49
SACRAMENTO, CA 94273-0001
PHONE (916) 654-5266
FAX (916) 654-6608
TTY 711
www.dot.ca.gov



*Flex your power!
Be energy efficient!*

March 2013

**NON-DISCRIMINATION
POLICY STATEMENT**

The California Department of Transportation, under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person in the State of California shall, on the grounds of race, color, national origin, sex, disability, religion, sexual orientation, or age, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity it administers.

For information or guidance on how to file a complaint based on the grounds of race, color, national origin, sex, disability, religion, sexual orientation, or age, please visit the following web page: http://www.dot.ca.gov/hq/bep/title_vi/t6_violated.htm.

Additionally, if you need this information in an alternate format, such as in Braille or in a language other than English, please contact the California Department of Transportation, Office of Business and Economic Opportunity, 1823 14th Street, MS-79, Sacramento, CA 95811. Telephone: (916) 324-0449, TTY: 711, or via Fax: (916) 324-1949.

A handwritten signature in blue ink, appearing to read "Malcolm Dougherty".

MALCOLM DOUGHERTY
Director

This page intentionally left blank

Appendix D Comments and Responses on Draft Environmental Impact Report

The following pages contain comment letters and public hearing transcripts received during the public circulation of the DEIR and the corresponding responses to those comments. Responses have been arranged to follow the corresponding comment letter. A summary of commenters is listed in the table below.

Letter Number	Agency/Commenter Name
Local Agencies/ Organizations	
A-1	Dr. Tom Williams/ Coalition for a Safe Community
A-2	Dr. Tom Williams/ Coalition for a Safe Community
A-3	Christopher Sutton/ Law Office of Christopher Sutton
A-4	Pasadena Heritage
A-5	Los Angeles Conservancy
A-6	Dr. Tom Williams/ Coalition for a Safe Community
A-7	Dr. Tom Williams/ Coalition for a Safe Community
A-8	Westridge School
A-9	Dr. Tom Williams/ Coalition for a Safe Community
A-10	National Trust for Historic Preservation
A-11	City of Pasadena
A-12	City of South Pasadena
A-13	No 710 Action Committee
A-14	Sequoyah School
A-15	California Transportation Commission
A-16	Christopher Sutton/ Law Office of Christopher Sutton
A-17	Pasadena Heritage
A-18	Sequoyah School
A-19	Los Angeles Conservancy
A-20	National Trust for Historic Preservation
Interested Parties/General Public	
P-1	Shannon Lechuga
P-2	Dr. Cylde T. Williams/ Coalition for a Safe Community
P-3	Chang Cho
P-4	Alison Lau
P-5	Hurbert Ho
P-6	Watraud Wheeler

Letter Number	Agency/Commenter Name
P-7	Virgina Flores
P-8	Donna Janosik
P-9	Ana Moreno
P-10	Weltraud Wheeler
P-11	Rosalva Garcia
P-12	Vincent N. Unpingco
P-13	Victoria Sandoval
P-14	Tom Williams
Comment Cards	
CC-1	Alex Johnson
CC-2	Robert Ahumada
CC-3	Tina Moreno
CC-4	Mike Rivera
CC-5	Candice Alvillar
CC-6	Dr. Tom Williams
CC-7	Dr. Tom Williams
CC-8	Nataliia Bacchus
CC-9	Marie Ibsen Risigari-Gai
CC-10	Marie Ibsen Risigari-Gai
CC-11	Robert and Linda Cole
CC-12	Richard Johansson
CC-13	Maria Crespo
CC-14	Victoria Sandoval
CC-15	Josie Broomis
CC-16	Mark Ng
Transcript No. 1 from the August 6, 2015, Public Hearing	
T1-1	Don Jones
T1-2	Dr. Tom Williams
T1-3	Micheal "Mike" Rivera
T1-4	Elisa Almeida
T1-5	Michelle Garcia
T1-6	Patrick Garcia
T1-7	Jennifer Maldonado
T1-8	Yvonne Rodriguez
T1-9	Hugo Garcia
T1-10	Joe Cano
T1-11	Therese Hernandez
T1-12	Linda Krausen
T1-13	Maria Miranda

Letter Number	Agency/Commenter Name
T1-14	Nora Verdesoto
T1-15	Christopher Sutton
T1-16	Victoria Sandoval
T1-17	Maria Crespo
T1-18	Elisa Almeida
T1-19	Linda Krausen
T1-20	Christopher Sutton
T1-21	Don Jones
Transcript No. 2 from the August 10, 2015, Public Hearing	
T2-1	David Roberti
T2-2	Annette Marchain
T2-3	Marie Ibsen Risigari-Gai
T2-4	Christopher Sutton
T2-5	Dr. Tom Williams
T2-6	Don Jones
T2-7	Raymond
T2-8	Jim Miller
T2-9	Roberto Flores
T2-10	Brenda Blanco
T2-11	Joe Cano
T2-12	Hugo Garcia
T2-13	Theresa Hernandez-Cano
T2-14	Alexi Shatz
T2-15	Liza Almedia
T2-16	Anne Alderson
T2-17	Christopher Sutton
T2-18	Dr. Tom Williams
T2-19	Hugo Garcia

This page intentionally left blank

LOCAL AGENCIES/ORGANIZATIONS

Local Agencies/ Organizations	
A-1	Dr. Tom Williams/ Coalition for a Safe Community
A-2	Dr. Tom Williams/ Coalition for a Safe Community
A-3	Christopher Sutton/ Law Office of Christopher Sutton
A-4	Pasadena Heritage
A-5	Los Angeles Conservancy
A-6	Dr. Tom Williams/ Coalition for a Safe Community
A-7	Dr. Tom Williams/ Coalition for a Safe Community
A-8	Westridge School
A-9	Dr. Tom Williams/ Coalition for a Safe Community
A-10	National Trust for Historic Preservation
A-11	City of Pasadena
A-12	City of South Pasadena
A-13	No 710 Action Committee
A-14	Sequoyah School
A-15	California Transportation Commission
A-16	Christopher Sutton/ Law Office of Christopher Sutton
A-17	Pasadena Heritage
A-18	Sequoyah School
A-19	Los Angeles Conservancy
A-20	National Trust for Historic Preservation

Dr. Tom Williams

A-1

No links are provided for the public comment meetings in El Sereno and Pasadena... Due to the lack of outreach online and pseudo-complexity of the "Alternatives Description, the delay in circulation of the 041615, and the lack of cross-referencing of the 2015 and 2014 DRIRs WE REQUEST A 60 DAY EXTENSION TO OCTOBER 26 2015.

A-1-1

A-1-1

With regard to links for public comment meetings it is unclear what the commenter is requesting. Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. Caltrans conducted two public hearings; August 6, 2015 in El Sereno and August 10, 2015 in Pasadena.

Dr. Tom Williams / Citizens Coalition for A Safe Community

A-2

Revised Earlier comment: No links are provided for the public comment meetings in El Sereno and Pasadena...

Due to the lack of outreach online and pseudo-complexity of the "Alternatives Descriptions", the delay in circulation of the DRIR 041615, and the lack of cross-referencing of the DRIR 2015 and 2014 DRIR...WE REQUEST A 60 DAY EXTENSION TO OCTOBER 26 2015.

A-2-1

A-2-1

With regard to links for public comment meetings it is unclear what the commenter is requesting. Public circulation for the DEIR ended on September 8, 2015, extended from August 24, 2015. For a total of 60 days. Caltrans conducted two public hearings; August 6, 2015 in El Sereno and August 10, 2015 in Pasadena.

Caltrans fails to provide an alternative in the DEIR that provides relocation assistance, relocation payments, and replacement housing to the 148 families that Caltrans has concluded in its Displacement Relocation Impact Report ("DRIR") will occur as a result of the Affordable Sales Program. Government Code section 54235 in the Roberti Law and Public Resources Code sections 21000 through 21004 in CEQA together mandate that the displacement of families as a result of the sale of surplus Caltrans properties is an adverse environmental impact that must be minimized and mitigated to the maximum extent feasible. The DEIR fails to analyze alternatives to the proposed Affordable Sale Program that could minimize family displacements. One such alternative would be for Caltrans to use local income data to determine "area median income" and "150 percent of area median income" instead of using county-wide income data. Caltrans is using local data to calculate market values of properties and market rental rates, which raises those dollar amounts above what many Caltrans tenants can afford, and Caltrans use of county-wide income data sets the eligible income level lower, thereby disqualifying many tenants from buying or renting at a price or rental rate based on their own actual income. Caltrans' use of differential data sources is predicted by its own DRIR to lead to the displacement of about 148 families under the Affordable Sales Program who could otherwise remain in their homes if Caltrans were to use local income data, as allowed by the U.S. H.U.D. regulations cited in the Roberti Law at Section 54236(h). CEQA section 21004 mandates Caltrans to use its discretionary power to minimize adverse environmental impacts such as the displacement of families. The DEIR needs to analyze alternatives that do so. The DEIR's failure to analyze such alternatives is a violation of CEQA and the goals of the Roberti Law.

A-3-1

A-3-2

A-3-3

A-3-4

Also, Caltrans has failed to provide an alternative in the DEIR that provides for the active restoration and preservation of vacant residences owned by Caltrans and already determined to be eligible for inclusion on the National Register of Historic Places. Caltrans needs to commit funds derived from the sales of other properties to keep it in compliance with the U.S. Historic Preservation Act and to ensure the restoration and preservation of the approximate 100 structures now owned by Caltrans within the SR 710 North Corridor that are eligible for inclusion on the National Register of Historic Places. Just two of these vacant structures are 1199 and 1200 S. Pasadena Avenue in Pasadena 91105. Otherwise Caltrans could be barred from receiving federal funds for this transportation corridor or other transportation projects. The DEIR needs to analyze an alternative that restores and preserves all the historic properties now owned by Caltrans in the SR 710 North Corridor

A-3-5

A-3-6

Caltrans has concluded in a Displacement Relocation Impact Report that about 148 families will be displaced by the Affordable Sales Program. This displacement is caused in part by Caltrans selecting different geographic areas from which to derive data regarding "area median income" and "market value" and "market rent." Caltrans relies on county-wide data from all of Los Angeles County to determine "median income," "very low income," "low income," and "moderate income." Yet Caltrans uses real estate sales data and rental data from the cities of Pasadena, South Pasadena, Los Angeles, and adjoining communities to

A-3-7

A-3-8

determine "market value" for sales prices and "market rent" for rental rates on properties in the SR 710 North Corridor. This use of differential data sources has a perverse impact that will lead to the predicted displacement of families, including families with one or more disabled family members. By using these differential types of data, the values for property sales and property monthly rental rates are set much higher than most of the existing tenants in the properties can afford. Yet, by using county-wide income data these same tenants are determined to be above the income categories which would entitle them to purchase or rent the properties at a price derived from their actual income. Caltrans' use of county-wide income data places most existing tenants above the income category of "150 per cent of area median income" found in Government Code section 54237(a)(3) in the Roberti Law. Caltrans has chosen to select a county-wide data source for calculating "area median income" instead of using data of the median income from the three zip codes where the properties are located and where the tenants reside. Caltrans needs to use consistent data sources. To be fairer to the existing tenants, to further the affordable housing and community preservation goals of the Roberti Law, and to reduce family displacements, Caltrans must either use county-wide data for both income and value determinations, or use local zip codes for both income and value determinations. Using consistent data sources will reduce the number of predicted displacements that will be caused under the Affordable Sales Program, and better comply with CEQA at Public Resources Code section 21000, 21001, 21001.1, 21002, 21003, and 21004 and Government Code section 54235 in the Roberti Law --- Caltrans has an affirmative duty to reduce and mitigate the impacts of the Affordable Sales Program, and to reduce the number of families predicted to be displaced by the Program. Using median income data from the local zip codes where the tenants reside in Caltrans properties will be the most effective in reducing displacements by raising the calculated level of "150 percent of area median income" so that a greater number of existing tenants can qualify for purchase prices and affordable rents based on the income levels in their local communities. Otherwise, Caltrans should use market data and rental data from the entire county to reduce purchase prices and lower rental rates, but this alternative may not be as effective in lowering the number of families displaced under the Affordable Sales Program. Government Code sections 54235 and 54236(h), CEQS section 21004, California H.C.D. regulations and U.S. H.U.D regulations allow Caltrans to calculate "area median income" in an alternative manner, and CEQA requires Caltrans to do so in a manner which reduces the maximum degree feasible the displacement of families under the Affordable Sale Program. The draft regulations need to be amended to include the goal or community preservation and reducing tenant family displacement as set forth in Government Code section 54235 of the Roberti Law. Those sections mandate Caltrans to reduce the displacement of families when surplus properties are offered for sale, and determine that such displacement is an environmental impact that must be mitigated using funds, resources, and powers available to Caltrans and within its discretion.

A-3-8

A-3-9

A-3-10

A-3-11

Caltrans has failed to include in the DEIR or the proposed Affordable Sales Program any analysis of the impact on disabled persons of the Affordable Sales Program. The unreasonably short deadlines for an existing tenant to respond to an offer to sell from Caltrans have no reasonable accommodation process for people who cannot respond within the deadline due to their age or disability or due to the age or disability of members of their

A-3-12

household. Likewise, there is no analysis of the economic impacts on households which include one or more disabled persons. Caltrans fails to analyze any alternative price reductions or Caltrans financing of the purchases to accommodate such households. By utilizing market data from local zip codes to determine market values for sales and market rental rates for continued occupancy Caltrans is using data from nearby higher income areas and areas of lower minority populations to set the sales prices and rental rates on properties Caltrans owns in the SR 710 North Corridor. This discriminates against the lower income and higher minority populations within the properties owned by Caltrans. Caltrans' management practices include: deferred maintenance (often for years or decades), not paying for household water and landscaping (usually paid for by private landlords in adjacent area to maintain the property's quality), and using contractors of lower quality work than used for private rental properties. Most higher-quality maintenance contractors refuse to work for Caltrans due to quirky and obnoxious Caltrans personnel and due to extreme delays in being paid by Caltrans. These endemic Caltrans management traits regarding the SR 710 North Corridor properties do not apply to the privately owned and privately-managed residences in adjacent areas. That is, Caltrans is a terrible property manager, which the employees and Directors of Caltrans District Seven in Los Angeles have admitted for decades. Long term Caltrans management is itself a negative factor in a property's rental value and market value. It is common knowledge in the real estate industry that Caltrans mismanages and neglects the properties it owns, rents, and offers for sale. It is market fact that the quality of all the properties have severely eroded under Caltrans management. Caltrans' reputation as a bad property manager and as having a practice of passive neglect on all properties it owns reduces their rental value and sales market value. This Caltrans "blight" on such properties is not taken into account by Caltrans when it determines rental rates and sales prices. Caltrans assumes it is a perfect property manager, or at least that its management has no economic impact. This a false assumption. This false assumption results in Caltrans setting artificially higher rental rates and high sales prices within the SR 710 North Corridor, where there are greater numbers of lower income and minority persons. The Affordable Sales Program needs to include adjustments downward in sales price and rental rates to reflect the long term, ongoing, and well-know "Caltrans property management blight" on the quality and desirability of the properties owned by Caltrans. Caltrans devalues every property it owns and manages simply by being Caltrans.

↑ A-3-12

A-3-13

A-3-14

A-3-15

A-3-16

Caltrans has failed to provide or analyze the past and future impact on historic resources Caltrans has owned for decades that has occurred due to Caltrans mismanagement and neglect and will occur in the future as a result of the Affordable Sales Programs. Particularly on the approximate 100 Caltrans owned properties already eligible for inclusion in the National Register of Historic Places under the federal Historic Preservation Act. Examples are 1199 and 1200 S. Pasadena Avenue in Pasadena 91105.

A-3-17

The Roberti Law (Government Code sections 54235 to 54237.8) is not the only state law under which these properties in the SR 710 North Corridor can be sold by Caltrans. Streets and Highways Code sections 118, 118.1, 118.5, 118.6, and 119 provide an alternative process for sale of the properties in the SR 710 North Corridor. Caltrans has failed to adopt any regulations to implement any alternative sales programs under those laws. Caltrans has continued to violate the third paragraph of Streets and Highways Code section 118.6 by failing to adopt sales and rental regulations under the Administrative Procedures Act which implement Streets and Highways Code sections 118, 118.1, 118.5, 118.6, and 119. The third paragraph of Section 118.6 reads as follows: "The department shall adopt rules and regulations to determine which real property outside of calculated right-of-way lines is no longer needed or used for highway or other public purposes, and which is available for sale or exchange. The department is authorized to lease all real property not presently needed or used for highway purposes pending the sale or exchange of such property." Despite this requirement in law neither the DEIR for the Affordable Sales Program's proposed regulations include any explanation on how Caltrans determined which properties to offer for sale first and which to offer for sale later. No regulations have been even proposed for the sale of properties by a process other than under the Roberti Law. The sale of vacant land, the sale of properties occupied for commercial purposes, the sale of properties occupied for non-profit purposes, and properties which include vacant structures not currently used for residential purposes could be sold under Streets and Highways Code sections 118, 118.1, 118.5, 118.6, 119 and other laws, but no regulations or analysis or any list of such properties or their potential sale are included in the DEIR or in the Affordable Sales Program. Caltrans has recently offered several vacant land properties for sale to the City of South Pasadena, but failed to adopt regulations for this process or to consider the procedures for sale or lease of properties under Streets and Highways Code sections 100.2, 100.21, 100.22, 100.25, 104.5, 104.6, 104.7, 100.8, 100.9, 100.10, 100.11, 100.12, 100.13, 100.15, and 116. The DEIR and regulations need to consider all the alternative means by which the sales of Caltrans properties are permitted.

A-3-18

A-3-19

A-3-1

As stated in Section 4.2.2.2 Regulatory Requirements, relocation assistance will be provided as applicable under California Government Code sections 54235 through 54238.7, hereafter referred to as the "Roberti Act." The Roberti Act references specific sections of the California Government Code to describe the relocation assistance provided for eligible participants. The persons displaced as a result of this proposed action will receive relocation assistance program (RAP) benefits through California Government Code Section 54238.3. Further, the Environmental Commitment Record, located in Appendix E, list minimization measure R-1, that will be implemented to avoid and minimize the number of people displaced.

Caltrans also wants to clarify that the acronym DRIR stands for Draft Relocation Impact Report and not Displacement Relocation Impact Report as the commenter suggests.

A-3-2

Please see response to A-3-1.

A-3-3

This comment raises concern about income data. Government Code Section 54236(h) dictates that Caltrans use median income as published by the United States Department of Housing and Urban Development (HUD) as implemented by Health and Safety Code Section 50093.

A-3-4

Caltrans respectfully disagrees with the comment that the Draft EIR failed to comply with CEQA and the Roberti Law. The comment also raises concern about impacts to relocations please see response A-3-1.

A-3-5

Appraisals will be conducted on the existing "as is" condition of the property which takes into account any repairs required to make the property safe and habitable. The cost of these repairs is reflected in the appraised fair market value. For properties offered for sale at an affordable price, pursuant to Government Code Section 54237(b), Caltrans will provide repairs limited to the Minimum Property Standards and reasonable lender-required repairs.

A-3-6

This comment raises concern about the funds resulting from the sales; Government Code Section 54237.7 allocates the proceeds of sales made by Caltrans for the purposes of providing repairs to properties sold at an affordable price, pursuant to Section 54237(b), and for certain transportation-related projects in the geographic area described as "Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and that portion of Los Angeles within the 90032 ZIP Code."

A-3-7

Caltrans wants to clarify that the acronym DRIR stands for Draft Relocation Impact Report and not Displacement Relocation Impact Report as the commenter suggests.

A-3-8

This comment raises concern about income data. Please see response A-3-3.

A-3-9

This comment raises concern about income data. Please see response A-3-3.

A-3-10

This comment raises concern about income data. Please see response A-3-3.

A-3-11

This comment raises concern about income data. Please see response A-3-3.

This comment also raises concern about relocation impacts. As stated in Section 4.2.2.2 Regulatory Requirements, relocation assistance will be provided as applicable under California Government Code sections 54235 through 54238.7, hereafter referred to as the "Roberti Act." The Roberti Act references specific sections of the California Government Code to describe the relocation assistance provided for eligible participants. The persons displaced as a result of this proposed action will receive relocation assistance program (RAP) benefits through California Government Code Section 54238.3. Further, the Environmental Commitment Record, located in Appendix E, list minimization measure R-1, that will be implemented to avoid and minimize the number of people displaced.

A-3-12

This comment raises concern about deadlines for responding to an offer. The 120-day time period is considered adequate for prospective buyers to submit documentation and express interest in purchasing property under the Affordable Sales Program. Prospective buyers are not expected or required to secure financing and/or close escrow within that 120-day period.

A-3-13

This comment raises concern about financing options. Please refer to Appendix E, Environmental Commitment Record, of the environmental document which includes minimization measure R-1 that would be implemented to avoid and minimize the number of people displaced. Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. For those who are relocating and are eligible, Government Code Section 54238.3(b) sets forth the relocation benefits and advisory assistance to be offered.

A-3-14

This comment raises concern about income data. Please see response A-3-3.

A-3-15

Caltrans began acquiring properties over the past fifty (50) years. Due to the on-going litigation over the completion of the 1964 adopted meridian route, Caltrans has remained the owner. Caltrans adopted a policy of management; repairing and leasing the homes to the public. At the time, Caltrans was not fully staffed to address the management and oversight of these properties, as it was never the intention to

keep the properties for the long term. Caltrans had to adopt a policy, secure budget approval and develop a system as a long term asset manager. Over the past four (4) decades, Caltrans has become much more efficient in its management processes and is effectively monitoring property maintenance.

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184.

A-3-16

Caltrans began acquiring properties over the past fifty (50) years. Due to the on-going litigation over the completion of the 1964 adopted meridian route, Caltrans has remained the owner. Caltrans adopted a policy of management; repairing and leasing the homes to the public. At the time, Caltrans was not fully staffed to address the management and oversight of these properties, as it was never the intention to keep the properties for the long term. Caltrans had to adopt a policy, secure budget approval and develop a system as a long term asset manager. Over the past four (4) decades, Caltrans has become much more efficient in its management processes and is effectively monitoring property maintenance to insure tenants that current property oversight prevents homes from falling into disrepair and deter blight from taking over their communities.

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184.

A-3-17

Caltrans respectfully disagrees with the comment that the environmental document fails to analyze historical resources. As discussed in Section 4.3 Cultural Resources, all feasible steps will be taken to ensure that the appropriate protection is conveyed upon the sale of any historic resource. As stated in Appendix E, Environmental Commitment Record, Caltrans will provide a one-time monetary payment, a stewardship fee, to ensure that the qualified organization will have the financial support for the continued monitoring of the historic covenants or other protective measures as agreed. Additionally, Caltrans has received concurrence on a Finding of No Adverse Effect from the State Historic Preservation Officer.

A-3-18

Caltrans adopted Excess Real Property Regulations to implement Streets and Highways Code 118 in February 2015.

A-3-19

Government Code section 54237 sets forth priorities for residential or leased nonresidential properties. The properties offered to the City of South Pasadena are vacant, unimproved properties. Section 1.3 in the environmental document reads, "Caltrans may offer to sell vacant lots and unimproved properties pursuant to Streets and Highways Code Section 118.6, which allows properties to be offered by auction, sealed or continuous bid to the public, or by sale or exchange to public agencies. Any improved property or property with a tenant is sold by the statutes."



August 21, 2015

Mr. Ron Kosinski
Caltrans District 7, Division of Environmental Planning
100 South Main Street, MS-16A
Los Angeles, CA 90012

Comments on SR-710 Surplus Property Sales Draft EIR

Dear Mr. Kosinski,

Pasadena Heritage will welcome the release of properties currently owned by Caltrans along the SR-710 corridor and the community benefits that their return to private ownership will bring. We have reviewed the SR-710 Surplus Property Sales Draft Environmental Impact Report and offer the following comments and questions.

Determination Of Surplus Status

We are concerned about the identification of parcels (owned by Caltrans) which would be impacted by the alternatives currently under consideration in the SR-710 North Study and how their identification influences which Phase of sales they will be assigned. This issue is complicated by the myriad ways in which the potentially surplus properties are referenced throughout the document:

- Section S.2 - “Are not impacted by the project alternatives being evaluated in SR-710 North Study”
- Section S.3 - “not within scope of the remaining project alternatives for SR-710 North Study”
- Section S.4 - “surplus properties that are no longer needed for the SR-710 North Study”
- Section 1.1.1, Page 1-7 - “once the parcels are identified as no longer necessary for the current SR-710 North Study, they may be declared excess/surplus.”

A-4-1

This confusion is further complicated by the procedurally flawed decision on behalf of Caltrans to base the findings in this document on the not-yet-approved Draft Finding of Effect document that is part of the Federal Section 106 process. Section 4.3.4 (p4-111) of the Draft EIR states “the potential for the SR-710 Surplus Property Sales alternatives to affect cultural resources is based on the preliminary Finding of No Adverse Effect for the SR-710 Surplus Property Sales.” As Table 1.1 confirms, SHPO concurrence on the FOE is required; the preliminary document and its finding of no adverse effect may change, which could then influence the mitigation necessary on several of the parcels

A-4-2

proposed as surplus. **Considering that SHPO consultation is ongoing, incomplete, and not finalized in any way, it is premature for this document to make any legally-binding conclusions based at this time.**

A-4-2

Furthermore, we strongly oppose any conclusion based on the preliminary FONAE because of its gross and alarming inconsistencies and deficiencies. As extensively detailed in our July 2, 2015, letter to Caltrans District 7 Division of Environmental Planning regarding the draft Finding of No Adverse Effect, we found this preliminary document to be full of discrepancies and flawed conclusions, thus rendering any reference to it equally flawed.

One primary cause for concern is the findings made in the referenced technical reports regarding potential damage to designated historic resources within the vicinity of the north portal of the Freeway Tunnel Alternative. These findings are critical to the Surplus Property Sales Draft EIR, which states that those properties not impacted by the project alternatives are those that will be declared excess and released for sale. According to the supplemental technical memo prepared by Jacobs Associates, *Potential Settlement Effects on Historic Properties*, several historic resources in the Markham Place National Register Historic District are at moderate-to-severe risk of damage due to excavation-induced ground settlement caused by tunnel boring and cut-and-cover excavation activities. However, this Draft EIR document fails to reference these findings and assumes these parcels will be declared surplus and released for sale. **The Final EIR findings must be based on the FINAL version of the FOE with which the SHPO concurs.**

A-4-3

Historic Preservation Covenants

Because the 710 freeway corridor in Pasadena cuts through some of our oldest and most prominent neighborhoods, many historic properties owned by Caltrans are outstanding examples of our city's rich architectural legacy and as such are individually eligible for listing on the National Register of Historic Places. Their preservation is of great importance to our community; the public benefit from protection of these properties necessitates historic covenants. However, we are concerned that **the Draft EIR document fails to clarify how historic preservation covenants function and what minimum restrictions they would impose.** Because of the great flexibility these legal instruments have and how well they can be adapted to the resource(s) in question, details on covenant considerations that reflect the range of properties, their character-defining features, and their current conditions is needed.

A-4-4

Further, it is unreasonable to assume, as the document authors do, that a covenant would impact salability in any manner different from an historic designation or overlay. There is no precedent for covenants obstructing a sale. Covenants generally do not necessarily prevent change, but guide it according to well-defined parameters. Additionally, the strictest covenants would hypothetically be applied to the rarest and most significant of historic resources, similar to our local historic monument status.

A-4-5

The document correctly references the lead agency's responsibilities:

- PRC 5024.5 states “prudent and feasible measures that will eliminate or mitigate the adverse effects”
- CEQA Guidelines Section 15064.5(b)(4) “the lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable...”

A-4-5

Nonetheless, the Draft EIR's proposal that “if the rights of refusal are exhausted and no buyer has been identified for a historic property due to the presence of a protective covenant associated with the property, Caltrans will remove the covenant”. This sublanguage is directly at odds with Caltrans obligation to meet its responsibilities and is in direct conflict with the purpose of mitigation measures under CEQA Guidelines.

Protection of Historic Neighborhoods

Caltrans' determination that “there is no substantial adverse change because the properties would be transferred with covenants and/or agreements that will provide protection of each property's character-defining features” assumes that ALL historic properties will be sold/transferred with covenants applied, which we don't believe is a realistic expectation. Furthermore, this course of action would protect only designated resources; it does not adequately keep the historic integrity of eligible but undesignated historic neighborhoods intact, i.e. the Pasadena Avenue Historic District. Additionally, covenants apply solely to the historic structure and offer no protection for established neighborhood character or historic setting. To ensure that the State fulfills its obligation to protect historic resources, eligible National Register resources (individual and districts) must be designated prior to transfer of ownership. This applies particularly to properties in Pasadena, with which we are most familiar, as our local preservation ordinance only offer any real protections to National Register-listed or locally designated historic monuments, landmarks or landmark district contributing properties.

A-4-6

Resource Surveys and Associated Data

It is concerning to see that in Figure 1-4, Sheet 11 of 12, not all addresses on the map correspond with addresses listed in Table 1.2. We also found that Figure 4-3, Sheet 9 of 9 does not reflect the addresses listed in Table 1.2 and their status. The maps and tables must be consistent if they are to be relied upon for valid decision-making.

A-4-7

In Section 4.3.2 page 4-82, the document states that “the majority of the parcels are in a large continuous section along the 710 corridor with the parcels becoming more discontinuous in the northern portion of the corridor. However, properties located in a historic district are relatively dense and close together.” Contrary to this statement, the maps released illustrate that the majority of Caltrans-owned properties are in the northern portion of the corridor, where there are the two largest historic districts (eligible and listed), which as the document described, are “relatively dense and close together.” This paragraph is confusing and should be revised to reflect reality.

A-4-8

In addition to the comments above, we have the following questions:

Does Section S.5 state “there is a low potential for adverse impacts to cultural resources resulting in a significant effect,” because of mitigation measures? This is not clear.

A-4-9

Section 1.3 Overview (p1-9)

Do public gardens and similar uses constitute “improved property” understood for purposes of SHCS118.6?

A-4-10

Section 1.3 (p1-13) explains that proceeds from the sale of surplus properties are to be allocated to the SR710 Rehabilitation Account for the rehabilitation of surplus single-family homes for which lenders or government housing assistance programs require repairs and says the account is to be continuously refilled with each sale. However, the document fails to explain, if there are no funds available at the onset, how will work on the earliest projects be funded? This issue must be resolved prior to any sales.

A-4-11

In conclusion, Pasadena Heritage believes that a combination of historic designations and preservation covenants are necessary to achieve adequate and long-term protection for all historic resources as well as highly significant individual properties.

A-4-12

We are of the opinion that Option 1 with retention of subsurface rights by Caltrans for a tunnel is a disincentive to potential property buyers, far more so than any historic preservation mechanism. The release of properties back to private ownership is an opportunity to bring stability and vitality back to these historic neighborhoods. **The most appropriate alternative for historic properties and re-instatement of neighborhood would be Alternative 1, Variation A** is, if the above issues are re-evaluated and corrected where necessary and reasonable mitigation measures developed to address impacts not solely from the sale of the properties, but those associated with the SR-710 North Study as well.

A-4-13

We thank you for considering our comments and look forward to receiving responses.

Sincerely,



Susan N. Mossman
Executive Director



Jesse Lattig
Preservation Director

CC: Christina Morris, Elizabeth Merrit, Brian Turner – National Trust for Historic Preservation
Adrian Scott Fine – Los Angeles Conservancy
Margaret Lin – City of South Pasadena
Vince Bertoni – Planning and Community Development Department, City of Pasadena
Geoffrey Baum – West Pasadena Residents Association

A-4-1

Caltrans has yet to determine that these properties will not be impacted by the remaining project alternatives in the SR - 710 North Study and cannot yet deem these properties excess. The most current information regarding the process and the timelines can be found at <http://www.dot.ca.gov/dist07/business/710sales>, specifically question #4 in the Frequently Asked Questions. Any timeframes provided are estimates based on the most current information available. Caltrans is committed to selling the properties as soon as possible.

A-4-2

The SR-710 Surplus Property Sales is not relying on the Federal Section 106 documentation for the SR-710 North Study. As discussed in Section 4.3 Cultural Resources, in the environmental document, Caltrans non-historic properties were documented and received concurrence from the State Historic Preservation Officer (SHPO) on their determination of eligibility within the last 5 years, therefore Caltrans did not require new determinations of eligibility. Caltrans has already received consensus from the SHPO about the determination of eligibility of the 113 historical resources. Further, Caltrans has received concurrence on a Finding of No Adverse Effect (FONAE) from the SHPO on July 28, 2016 which can be found in Appendix J of the environmental document.

A-4-3

The SR-710 Surplus Property Sales is not relying on the documentation completed for the SR-710 North Study. Caltrans agrees with the comment that the final EIR findings must be based on the final version of the Finding of No Adverse Effect (FONAE) with which the SHPO will concur for the SR-710 Property Sales. Caltrans has received concurrence on a FONAE from the SHPO on July 28, 2016 which can be found in Appendix J of the environmental document.

A-4-4

This comment requests clarification on how the historic covenant will function and what restrictions the covenants will impose. Please refer to Section 4.2.4.2 Alternative 2—Action Alternative of the environmental document where it states that properties sold with historic covenants and/or agreements will provide protection of each property's character defining features. Covenants will be placed by way of the deed prior to being transferred out of State ownership.

A-4-5

The language that Caltrans will remove the covenant in order to successfully sell the property has been eradicated. The covenants will now be attached to the deed of the historical resource.

A-4-6

Please see response to comment A-4-5. With regard to the comment about protecting eligible National Register resources; please refer to Table 4.8 Historical Resources on the Surplus Properties in the environmental document. The table identifies the district and the status of eligibility of the historical resources. The City of Pasadena's Municipal Ordinance Chapter 17.62.090, addresses review of alteration, demolition or relocation of Historic Resources. Municipal Zoning Code, Article 8, 17.80.020

defines “*Historic Resource*” as “A district, landscape, object, sign, site, or structure significant in American archaeology, architecture, culture, engineering, or history that is either designated or eligible for designation under City, State, or national significance criteria.” Caltrans is continuing consultation with historic preservation groups and the three involved cities to ensure all historic resources are adequately protected following the sale.

A-4-7

Figure 1-4 has been updated to include the correct parcels. Please note that Figure 4-3 illustrates properties that are National Register listed or eligible from Table 4.8 and not from Table 1.2 as the comment suggests.

A-4-8

The paragraph has been revised to read, “The PAL was established as the legal property boundaries for each parcel to be sold. Properties located in a historic district are relatively dense and close together.”

A-4-9

Section S.5 Environmental Analysis refers to Table S.1 Summary of Potential Impacts from Alternatives, as part of the summary to help the reader understand the potential impacts of each alternative on the various resources. The sentence, “there is a low potential for adverse impacts to cultural resources resulting in a significant effect” has been removed, since the covenants will now be attached to the deed of the historical resource/house and will not be removed.

A-4-10

Unimproved leased property not sold to current tenants, and vacant unimproved property, will be offered for sale pursuant to Streets and Highways Code section 118.6 which allows properties to be offered at auction to the public, or by sale or exchange to public agencies. A change would require legislation.

A-4-11

The SR-710 Rehabilitation Account will be funded with proceeds from the first initial sale. That is how work will be funded on the earliest properties.

A-4-12

Caltrans acknowledges that Pasadena Heritage believes that a combination of historic designations and preservation covenants are necessary to achieve adequate and long-term protection for all historic resources as well as highly significant individual properties. This comment does not raise an environmental issue within the context of the CEQA document and does not ask any questions regarding the technical analysis in the environmental document. Therefore, no response is necessary.

A-4-13

The commenter’s preference for Alternative 1, Variation A of this action has been acknowledged. This comment does not raise an environmental issue within the context of the CEQA and does not ask any

questions regarding the technical analysis in the environmental document. Therefore, no response is necessary.



523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

August 14, 2015

Submitted electronically

Andrew Nirenberg
Acting Chief, Division of Right of Way and Land Surveys
ATTN: Affordable Sales Program
California Department of Transportation
1120 N. Street, MS 37
Sacramento, CA 95814
Email: Affordable_Sales_Program@dot.ca.gov

RE: SR 710 Homes sales, Affordable Sales Program

Dear Mr. Nirenberg,

The Los Angeles Conservancy offers the following comments on the Affordable Sales Program to ensure the disposition process adequately addresses historic resources. We are very encouraged by Caltrans' intent to release surplus properties and return them to the private housing market, which will ultimately strengthen and stabilize neighborhoods throughout Los Angeles, unincorporated areas of East Los Angeles, South Pasadena, and Pasadena. For the purposes of this letter and not to repeat comments already provided elsewhere, we are focusing on Los Angeles and the unincorporated areas of East Los Angeles.

The Conservancy would like to ensure protections are in place for identified historic properties that will ultimately transfer out of Caltrans' hands into private ownership. Part of this disposition process should include an up-to-date inventory of historic resources, identifying historic resources eligible at both the local, state and national levels. This includes properties that are individually significant and those located within eligible and/or listed historic districts. We are concerned that there is presently only a focus on National Register-listed or eligible properties. All transferred properties that are identified as historic, whether at the local, state or national levels, need to be adequately protected from future harmful alterations or demolition.

A-5-1

To date neither El Sereno nor the unincorporated areas of East Los Angeles have been fully inventoried. The City of Los Angeles' SurveyLA initiative is set to begin its survey of El Sereno in November, with results made publicly available later in

A-5-2



the Summer or Fall of 2016. The Conservancy is not aware of any such plans for the affected unincorporated areas of East Los Angeles. We would strongly encourage Caltrans to begin work to help undertake this effort, and again identify those resources eligible at both the local, state and national levels.

A-5-2

There also needs to be language and a clear process in place to ensure long-term protections before the disposition and sale of properties moves forward. This aspect should be resolved prior to the offering and sale of any historic resources, either individually or those located with identified historic districts. We are especially concerned as Phase 1B includes known historic resources within the El Sereno area. The Conservancy believes a combination of local landmark designation and covenants and/or easements are necessary. We do not believe local landmark designation alone can fully address the need, as it provides greater uncertainty in terms of long-term protection as it is subject to change and political interference. Further, no such system currently exists for the unincorporated areas of East Los Angeles.

A-5-3

Caltrans should work with qualified easement-holding preservation organizations to further explore this process, to develop clear and appropriate language and address compensation that will be required to adequately enforce the covenant/easement long-term. The Conservancy has a conservation easement program in place already and we are happy to work with Caltrans to develop a process that might apply to the disposition of its historic properties, especially those located in the El Sereno and unincorporated areas of East Los Angeles. We suggest coordinating such a process with other relevant organizations as more than one entity might be involved, including Pasadena Heritage and the National Trust for Historic Preservation.

A-5-4

The Conservancy also strongly believes there should be a priority on existing and previous tenants in terms of priority, and community organizations that have clearly established an intent and working relationship with Caltrans to acquire a building that is now set for disposition.

A-5-5

One example is the Maycrest Bungalow Court at 4215-4223 North Maycrest Avenue in El Sereno. Caltrans has been working with El Sereno Bungalow Collective for more than five years to develop a reuse and plan for these long-vacant structures (empty since 1994). The Collective has a vested interest as an entity located immediately adjacent to this property. We greatly appreciate Caltrans willingness to date to entertain reuse options and provide access to these structures. We think it's important that the Collective, like current and former tenants in good standing, be given priority before private housing-related entities. If not the Collective directly, we think it's important to offer to the local government which may act as an intermediary to ensure the property is ultimately transferred into the right hands.

A-5-6

There needs to be greater clarification by Caltrans for these unique types of properties regarding their release and the establishment of a reasonable price (reflecting the existing conditions). Further we encourage Caltrans to develop a process that can identify and support circumstances (like the El Sereno Bungalow Collective) where properties are to be repurposed, by the cities and/or non-profit organizations, to provide public, free or low-cost services to low-income residents and are not to be redeveloped for profit.

A-5-7

We also want to strongly urge Caltrans to identify and treat the Maycrest Bungalow Court as an historic resource. We have consulted with SurveyLA on this property in advance of their upcoming survey of El Sereno. Initial feedback indicates these structures are eligible both locally and at the state level, and may be eligible for the National Register also, as this example represents a rare housing type and is particularly unique in its design and layout as a duplex form of a bungalow court.

A-5-8

Thank you for the opportunity to comment and provide feedback on the Affordable Sales Program. We look forward to working with Caltrans as this program is further defined and developed prior to any sales of historic resources. The Conservancy would like to serve as a resource and partner with Caltrans to ensure adequate long-term protection for these properties.

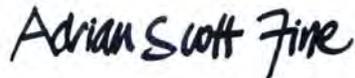
A-5-9

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.

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 or 213-430-4203.

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: Cindy Heitzman, California Preservation Foundation
Michael LoGrande, Ken Bernstein, City of Los Angeles, Department of City Planning, Office of
Historic Resources
Councilmember Jose Huizar
Betsy Merritt, Chris Morris, Brian Turner, National Trust for Historic Preservation
Claire Bogaard, No 710 Action Committee
Sue Mossman, Jesse Lattig, Pasadena Heritage

A-5-1

This comment requests to ensure that protections are in place for identified state owned historic properties that will be transferred (sold). Please refer to Section 4.3.5 Avoidance, Minimization, and/or Mitigation Measures to read the measures that would avoid and/or minimize impacts related to cultural resources. Please refer to 4.3.1 Regulatory Requirements to read the laws and regulations applicable to Caltrans.

A-5-2

Please see response to comment A-5-1. The state-owned resources in the El Sereno neighborhood and the unincorporated areas of East Los Angeles have been subject to intensive survey by Caltrans in 2008 and re-evaluated in 2014. Caltrans consulted with Janet Hansen, Deputy Manager of the Los Angeles Office of Historic Resources, and manager of Survey LA in the fall of 2014. As a result of this consultation Caltrans received SHPO concurrence on the determinations of eligibility for these two areas in October 2014.

A-5-3

The covenants and the ASP regulations will provide a clear process in place to ensure long-term protections before the disposition and sale of properties moves forward. Please see response to comment A-5-1.

A-5-4

As stated in Section 4.3.4.2 Alternative 2—Action Alternative in the environmental document, Caltrans will ensure that any agreements to protect historical resources will be enforceable by way of third-party monitoring by a non-profit. Caltrans acknowledges that Los Angeles Conservancy, Pasadena Heritage and National Trust for Historic Preservation is willing to work together in order to create covenants and easements with regard to the protection of historical resources.

A-5-5

Government Code section 54237 sets forth the priorities for sales. A change would require legislation.

A-5-6

Please see response to comment A-5-5

A-5-7

Please see response to comment A-5-5

A-5-8

The property known as Maycrest Bungalows was evaluated and determined not eligible for the National Register or California Register in September 2007, SHPO concurred in October 2007. The property was re-evaluated in 2008/2014 and again found not eligible for the National Register or California Register. The SHPO concurred with this determination in October 2014.

A-5-9

Caltrans acknowledges that the Los Angeles Conservancy is willing to serve as a resource to ensure adequate long-term protection for the properties.

Dr. Tom Williams / Citizens Coalition for A Safe Community

A-6

All of the above...

DEIR Sales of Surplus Properties

DATE: September 08, 2015, 4:30pm

TO: Affordable Sales Program, 1120 N Street, MS 37, Sacramento, CA 95814
Contact: Kimberly Erickson,
Lauren Wonder Phone: (213) 897-9092
e-mail: Affordable_Sales_Program@dot.ca.gov
www.dot.ca.gov/dist07/business/710sales

FROM: Dr. Tom Williams, Sr.Techn.Advis., Citizens Coalition for A Safe Community
Sierra Club, Angeles Chptr., Transportation Committee

SUBJECT: SR-710 Surplus Property Sales "Draft Env. Impact Report"
RE: Comments on DEIR for Sales of Surplus Property
Revised Deadline: "Affordable Sales Program Public Comment Period
Extended to September 8, 2015 (5PM)"

COMMENTS (Background without bold/italics; Comments/Requests wit **Bolding and Italics**)

1. Project Description for Sales is totally inaccurate, inadequate, and erroneous
Project description refers to Actions but does not directly state that the Action is the sales of properties in accordance with the proposed but not yet final "Affordable Sales Program' 'Regulations' 'Process'". Although a "project" and an EIR involve a discretionary approval by an organization, the EIR does not specify the approval/certification process of the final regulations, the EIR, and implementation for this project/action area. This is important with regard to prospective judicial actions which may be undertaken only within a period following "official" certification or approval of "The Action". Clearly define the approval/certification process for the FEIR and proposed implementation of "The Actions": Is the FEIR certified by Caltrans or the California Transportation Commission? Also as to "Whether and Administrative Approval by Caltrans can be appealed to the Calif.Transp.Comm.?? Adequately clarify the legislation/basis for approval/certification by a regulatory body without discretionary approval process or oversight.

A-6-1

2. Separation of DEIR/DEIS for Study and DEIR for Sales
The Sales DEIR closely connects the Sales Actions with conditions/phases resulting from the expected implementation of the Study DEIR Alternatives without considerations of expected continuing delays of the selected Study Preferred Alternative. This linkage and potential for prolongation/delays of the Sales phases render the Sales process as a virtual unknown duration.
Remove the linked Sales phases with Study Alternatives and their schedules. Provide fixed term phasing of one, three, and five years with assured sales/disposition during these phases.

A-6-2

3. Project/Action Area
*Remove the linked Sales areas with Study Alternatives and their areas. Provide fixed areas of LA City, South Pasadena, and Pasadena with assured sales/disposition during these areas.
Remove all revenue/funds linkages with Alhambra and LaCanada/Flintridge for any transportation purposes. Provide all revenues/measures ONLY to the cities which have been directly involved with the Sales program properties. Distribute funds in proportion to numbers/value of properties to those cities involved in the Sales.*

A-6-3

4. Project Need - First Mention of ASP without reference to proposed "Draft Regulations"
Change reference of ASP to SPR and/or to Sales Program Regulations (July Draft or 0715 ASPR0715); remove "A" or "Affordable" for all reference to the "Project/Action".

A-6-4

5. S-3/3 "...Surplus parcels no longer needed..."
Remove all references to "needed" by the Study Project alternatives; make the Sales Action a "tand-alone" "project"..

A-6-5

6. S-4/2 "...measures may be...included if...deemed reasonable feasible and prudent"
Many references to conditional terms of "reasonable", "feasible", "prudent", "practical", etc. all without definition and demonstration of their differences and parallels. Remove or explain/define or quantify any use of "reasonable", "feasible", "prudent", "practical", etc.. A-6-6

7. S-4/3 Community Demographics concerning potential relocations (displacement)
The "148" are not specifically identified nor is the process for its derivation and accuracy are provided. As no modifiers of "up to", "approximately", or "as estimated" are mentioned anywhere and no specific clear table of total and deletions is provided the entire discussion is confused and inadequate for estimating the "relocations" or "displacement" A-6-7

8. *Withdraw the DEIR and DRIR, Revise the "Project/Action Description", Project Purpose and Need, Alternatives, and thereby the entire assessment and mitigation sections of the DEIR.* A-6-8
9. *The DEIR and the Draft Regulations are directly linked by the latter's inclusion in the DEIR and repeated references to the "ASP regulations" which establishes the terms, conditions, requirements, and processes of the Project/Actions as implemented for the Project Area. The ASP regulations must be incorporated into the "Project Description" and the Purpose and Need for the Project/Action. As the ASP regulations are the administrative implementation of the various legislative measures and related codes and are specific to the Project Area, the "ASP Regulations" and their implementation are in fact the "Project" or the "Action" subject to CEQA. Review, revise, and recirculate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.* A-6-9
10. *Provide a formal Project Description (Action) for DEIR with all relations/links/references of actions (by section/paragraph references) of the various alternatives and their processes to the various legislative and administrative references of the discretionary actions/approvals which form the basis of any actions herein this DEIR. No Project/Action is provided in the DEIR and thereby renders the Purpose and Need section as proposed regulations, Roberti Bill, SB416, and Cal.Str. & Hwy. Code. Circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.* A-6-10
11. *Provide a concordance for the ASP Regulations (ASPReg) indicating the Codes and legislative sections/paragraph/clauses which are the basis of the regulatory sections and subsections and clearly identify those ASPReg sections/subsections and clauses which are original to these regulations and not based on legislative/code requirements and circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.* A-6-11
12. *Provide priorities and concordance for relocations and impacts between DEIR references, : DRIR 2014 (as part of DEIR SR-710 North Study) and DRIR 2015 (now included on Sales Web page) and circulate 30 days prior to the close of DEIR comments and circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.* A-6-12
13. *Remove references to DRIR 2014 for DEIR for Sales or provide comparisons for the ASP Regulations (ASPRegs) indicating relevant DRIR 2014 and 2015 bases for the ASPRegs. Similarly, compare the 2014/2015 DRIR and clearly indicate which sections and clauses have priority for the Sales Program and how such different priorities may influence the assessments of DEIR for the SR-710 North Study and for the SR-710 Sales DEIRs and circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.* A-6-13
14. *Provide links to ALL Technical Studies included as titles in the DEIR on the SR-710 Sales webpage and all referenced documents and emails therein and circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.* A-6-14
15. *Provide LATimes reference and rationale for use of 2000 census information for El Sereno in the DRIR 2015 but not Pasadena and South Pasadena and circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.* A-6-15
16. *Provide 2010 Census information and comparisons for precincts in 90032, consider excluding* A-6-16

Monterey Hills development as they are not part of the referenced LA-32 Neighborhood Council...and establish a relatively consistent "community" for the project (perhaps excluding University Hills and Hillside Village districts) and circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.

A-6-16

17. Rename the Alternative of "No Action" to "Future without Proposed Action" and assess for a period up to 2035 under continuing Caltrans responsibilities and past activities and circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.

A-6-17

18. SR-710 North Study DEIR alternatives must be coordinated to the specific properties through overlay drawings of all current alternative designs and affected properties with maps of all affected parcels and specific alternative design elements affecting the properties and circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.

A-6-18

19. An SR-710 Study Project Alternative has been proposed which would eliminate any coincidence and related sales effects on most if not all parcels in the City of Los Angeles. CD14 Council Member has further commented that the LACC Resolution (2012) prohibiting construction within and beneath the City of Los Angeles that must be considered under Land Use Impacts assessments as part of the Study and circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.

A-6-19

20. Regulations and the "Project" presume that any excess revenues generated by property sales will be placed into a separate account, and this account may be allocated to various cities within and beyond the communities subject to the surplus properties sales. Inclusion of Alhambra and LaCanada-Flintridge for receiving excess sales revenues appears totally unreasonable and must be mitigated. Such allocations clearly indicate an Environmental Justice issue and impact as the affected areas, especially the LA City portion, have needs for far greater funding of restoration of residences to their original occupable and/or to current code conditions. Mitigation must include the assignment of excess sales funds based on their generation and the properties not sold to non-previous-owners or non-tenants. Review, revise, and circulate responses within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.

A-6-20

21. Regulations are not cited as "The Project", a discretionary action, although all cited "action(s)" are based on the Regulations directly and indirectly while the State Streets and Highways Codes, the Roberti Bill, and the SB 416 provisions are in place and have tenure for direct use. As the actions are based on the regulations and regulations are based on various laws and requirements therein, the implementing regulations must be considered as the Project action. As the DEIR will proceed in the future through the comment/response period to the FEIR; and once completed, the FEIR and all elements of the Mitigation, Monitoring, and Reporting Plan must be certified by an agency with discretionary powers over the initiation of the Project implementation, which for State transportation projects would be presumably the California Transportation Commission.

A-6-21

Include the mitigation measures within the final, approved "regulations" as required for any approval of projects or a statement of "Overriding Conditions".

Provide the required process for preparation of the EIR and its certification and circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation.

22. DEIR p.1-19 pdf pg. 45 REGULATIONS

A-6-21

Sacramento, California, from July 1, 2015 through August 14, 2015, between the hours of 8:00 a.m. and 5:00 p.m. The documents can also be obtained by calling the Caltrans Affordable Sales Program at (916) 654-4790 or by visiting the Caltrans website at <http://www.dot.ca.gov/regulations.htm>.

If you have any comments regarding the modifications to the text of the proposed regulations or the revised SRIA, written comments must be submitted Caltrans by 5:00 p.m. on August 14, 2015, to:

Kimberly Erickson
ATTN: Affordable Sales Program
California Department of Transportation
1120 N Street, MS 37
Sacramento, CA 95814
FAX: (916) 654-6378
Email: Affordable_Sales_Program@dot.ca.gov

All written comments received by August 14, 2015, which pertain to the modifications of the text of the proposed regulations or the revised SRIA will be reviewed and responded to by Caltrans staff as part of the compilation of the final rulemaking file.

The recent review/comments for the "Regulations" and references to and inclusion of the previous draft regulations (Appendix F) in this DEIR thoroughly confuse the Project Description, the Regulations, and thereby the purposes/needs, alternatives, impact, and mitigation. Such confusion and absences of clear definitions renders the DEIR as inadequate if not incomplete. Remove/revise/recirculate.

Other More specific Comments

PHASING

S-2/3 1. **Phase 1:** Properties...not within the scope of the remaining project alternatives...SR-710...Study:

- a. **Phase 1A:** Single-family residences...nonhistoric and would not result in any community impact.
 - b. **Phase 1B:** All other residential properties...not within the scope of the remaining alternatives...SR-710...Study.
- No specific delineations are provided for Study "project alternatives" and this DEIR action including the Study's "No Action Alternative" which includes T-1 measures and would affect the Caltrans properties at Alhambra Ave., Concord, Lowell, and Allan.**

Without delineations of the Study alternatives, residential properties, and historic structures, assessment of effects of this DEIR alternatives, alternatives, and mitigation must remain inadequate if not incomplete.

Remove/revise/recirculate.

ASP Regulations

2-2/4 The ASP regulations are **anticipated to be finalized in late 2015**...assumed that none of the properties eligible to be sold under the **Roberti Bill and ASP** will be for sale in the 2014/2015 fiscal year. The escrow close date is anticipated to **begin** in:

- 2016 for non-historic properties in Phase 1 and
- later in 2016 for the historic Phase 2 and
- later in 2016 for the...Phase 3 properties.

As the ASP regulations (Draft 072015) are not finalized and will not be finalized before the closure of the Sales DEIR comments, the Project/Action and schedule are premature and unreasonable; therefore provide the required process for preparation of the schedules for the FEIR and its certification and circulate within 30 days from the close of DEIR comments and extend comment period for these documents to 30 days after circulation or review, revise, and recirculate the DEIR.

Remove/revise/recirculate.

S-2/3 2. **Phase 2:** Properties that are within the scope of the remaining project alternatives of the SR-710 North Study but can still be sold.

3. **Phase 3:** Properties declared surplus after the completion of the approved preferred project alternative in the SR-710 North Study.

1-9/1 The sale of properties is planned in three phases, which are outlined in Table 1.1.

Table 1.1 Summary of Sale Phases Phase Description

- 1 Properties not within the scope of the remaining project alternatives for the SR-710 North Study.
- 1A Single-family residences that Caltrans has determined to be non-historic and would **not result** in **any community impact**.
- 1B All other residential properties that are not within the scope of the remaining project alternatives.
- 2 Properties within the scope of the remaining project alternatives for the SR-710 North Study but that can still be sold.

A-6-21

A-6-22

A-6-23

A-6-24

3 Properties declared surplus after the completion of the approved preferred project alternative in the SR-710 North Study.

Source: http://www.dot.ca.gov/dist07/business/710sales/docs/Frequently-Asked-Questions-English_070314.pdf

As project alternatives have not been chosen or mitigated as preferred alternative and the CEQA/Project approval process is largely unscheduled, phasing cannot be scheduled nor can it be phased with respect to project measures and their area of affects on the Caltrans properties. The DEIR must be reviewed, revised, and recirculated, and properties must be directly related to Project specific elements, options, variants and alternatives and to the specific references for the ASPRegs.

Remove/revise/recirculate.

A-6-24

Reasonable Feasible Prudent

S-4/2 S.5 Environmental Analysis

...Impacts with regard to hazardous waste are considered to be less than significant with incorporation of mitigation measures.

Given the pre-1960 construction of most if not all structures, the DEIR is incomplete in that only two mentions of "asbestos" are made (one in text and one in table) without any basis of description of probable occurrences, e.g., spray-on coatings, insulation, fire-proofing around stoves/heat sources, and perhaps that mercury in switches and thermometers is not mentioned.

Remove/revise/recirculate.

A-6-25

Impacts related to local plan consistency...may be significant if mitigation is not incorporated by the affected local agencies.

As part of the DEIR, mitigation measures can be specified and be included in the Mitigation, Monitoring, and Reporting program which should have been provided as "Draft MMRP" in the DEIR.

Similarly a survey and remediation of all structures can be provided via "excess" or "surplus" revenues generated from sales of properties rather than providing any funds to LaCanada-Flintridge and Alhambra.

Remove/revise/recirculate.

A-6-26

There is a low potential for adverse impacts to cultural resources resulting in a significant effect.

No basis of such a statement is provided and therefore this statement must be removed.

Remove/revise/recirculate.

A-6-27

Other mitigation measures may be identified during public circulation of this DEIR and could be included if they are **deemed reasonable, feasible, and prudent.**

No definition of these general terms and no specific applications or criteria are provided and thereby renders "mitigation measures" totally incomplete and inadequate for assessment of impacts of the "Project" or alternatives.

Remove/revise/recirculate.

A-6-28

1-10/2 4. All other surplus residential properties (including multifamily residences) and all properties...not purchased by the former owners or the present occupants shall then be offered to housing-related public and private entities at a reasonable price for affordable housing.

No definition of the "private entities" or "reasonable" terms and no specific applications or criteria are provided and thereby renders any derived "mitigation measures" totally incomplete and inadequate for assessment of impacts of the "Project" or alternatives.

Remove/revise/recirculate.

A-6-29

4-58/Table 4.2 Housing Element Policy 6.6.2.2: Assisting in the Provision of Housing: Housing Acquisition and Rehabilitation – Eight-Year Objective. The City's [SoPas] objective is to continue to monitor surplus Caltrans properties in the...710 surface route corridor and provide technical assistance where **feasible** to **non-profit affordable housing developers** pursuing acquisition and rehabilitation of any Caltrans declared surplus properties in the 710 surface route corridor as **affordable housing**.

A-6-30

No definition nor differentiation of these "feasible" and "non-profit" general terms and no specific applications or criteria are provided and thereby renders related or derived "mitigation measures" totally incomplete and inadequate for assessment of impacts of the "Project" or alternatives.
Remove/revise/recirculate.

A-6-30

4-80/4 Because no variation of Alternative 2 is **expected** to result in the **displacement of a disproportionate number of low-income residents** or result in **significant, unavoidable impacts on low-income (or non-low-income) populations**, it is **reasonable** to conclude that no variation option...would result in adverse impacts that are **appreciably more severe** or greater in magnitude on **environmental justice populations** than the **adverse effects experienced by non-environmental justice populations**.

4-112/1 Further, 5024.5 (b) states "If the officer determines...an adverse effect..., the head of the state agency...and the officer **shall** adopt **prudent and feasible measures** that **will eliminate or mitigate the adverse effects**."

A-6-31

4-112/2 Pursuant to CEQA,...lead agency **shall** identify **potentially feasible measures** to mitigate...
No definition of the "prudent" or "reasonable" or "non-environmental justice" or "appreciably more severe" or "potentially feasible" terms and no specific applications or criteria are provided and thereby renders any derived "mitigation measures" totally incomplete and inadequate for assessment of impacts of the "Project" or alternatives.
Remove/revise/recirculate.

4-112/5 **All feasible steps will** be taken to ensure...**appropriate protective covenants** are conveyed...
No definition of the "private entities" or "reasonable" terms and no specific applications or criteria are provided and thereby renders any derived "mitigation measures" totally incomplete and inadequate for assessment of impacts of the "Project" or alternatives.
Remove/revise/recirculate.

A-6-32

5-19/1 Project Impacts Alternative 1: No Action (No Sale) Alternative

Under Alternative 1, Caltrans would retain ownership of the surplus parcels and the status quo would be maintained. Alternative 1 would **not [with potential reinterpretation of statement showing the change to positive statements]**

remove any obstacles to growth, **existing conditions may be obstacles to growth**
result in the need to expand public services, **existing conditions require public services not provided**
encourage or facilitate economic development...result in other activities...significantly affect..., or **existing conditions constrain economic development**
involve a precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment. **precedent setting actions**

A-6-33

Therefore, **it is reasonable to conclude** that Alternative 1 would not result in **growth-related effects**.
Current state-maintained conditions in a fully developed urban setting, other than currently vacant parcels held by Caltrans, have retarded or prohibited normal residential, commercial, and industrial development. Assumed no-impact of the No-Action, Alternative 1, continued Caltrans occupancy, is not reasonable given the historic decline of properties and lack of "reasonable" maintenance and assistance to low-income "tenants" and given current punitive and continuing increases of rents to displace low-income tenants.

Remove/revise/recirculate.

5-19/2 Alternative 2: Action Alternative Variations A and B All variations of Alternative 2 would remove a **potential** obstacle to growth...; however, neither variations would result in the need to expand public services, encourage or facilitate economic development that could result in other activities that could **significantly** affect the environment, or involve a precedent-setting action that could encourage and facilitate other activities that could **significantly** affect the environment.

Therefore, it would be **reasonable to conclude** that **neither variations of Alternative 2** would **[NOT]** result in growth-related effects.

A-6-34

No definition of the "reasonable", "significantly" or "potential" terms and no specific applications or criteria are provided and thereby renders any derived "effects" or "mitigation measures" totally incomplete and inadequate for assessment of impacts of the "Project" or alternatives.

**Buried negatives cause confusion and misinterpretations and must be more clearly identified as negatives or revised to a positive statement.
Remove/revise/recirculate.**

A-6-34

5-19/3 Reasonably Foreseeable Actions **Reasonably** foreseeable actions would occur in the areas that are **planned for development or redevelopment**. These **reasonably** foreseeable actions are listed...and shown...
5-22/5 Approximately **157 of the households** currently renting the surplus properties across all jurisdictions are enrolled in the **Affordable Rent Program**. Therefore, it is **reasonable** to assume that approximately 50 percent of the households renting the residential surplus properties are low-income households.

5-23/1 Project Impacts Alternative 1: No Action (No Sale) Alternative Community Demographics and Character ...existing conditions...maintained. **No impacts to established communities and/or neighborhoods would occur**....high levels of **home ownership** is one of the **factors generally related to a high level of community cohesion**,...it **may be reasonable** to assume...level of community cohesion **may in fact** be lower than it would if the excess properties were sold.

A-6-35

No definition of the "reasonable" or "reasonably" terms and no specific applications or criteria are provided and thereby renders any derived "effects" or "mitigation measures" totally incomplete and inadequate for assessment of impacts of the "Project" or alternatives.

Buried negative subjects cause confusion and misinterpretations and must be more clearly identified as negatives or revised to a positive statement.

Remove/revise/recirculate.

A-6-1

Caltrans respectfully disagrees with the comment that the description of the proposed action is insufficient. As discussed Section S.3 Description of Proposed Action and 1.3 Overview of Proposed Action in the environmental document, the description does state the sales of improved property or property with a tenant will be sold through the ASP regulations.

An Environmental Impact Report (EIR) purpose is to inform the public and governmental agencies with detailed information about a project's environmental effects, ways to minimize the project's significant environmental effects, and reasonable alternatives to the project. Caltrans will finalize this EIR. The action being analyzed in the SR-710 Surplus Property Sales environmental document involves the sale of the surplus properties originally acquired by Caltrans. While this property sale process would be implemented in compliance with the procedures outlined in the Affordable Sales Program (ASP) Regulations, the ASP regulations are being drafted and finalized as part of a separate regulatory process, with a separate public input process.

As discussed in Section 1.3, when the balance of the SR-710 Rehabilitation Account reaches \$500,000, additional proceeds go to the State Highway Account for allocation by the California Transportation Commission.

A-6-2

This comment requests to provide fixed term for phasing. Any timeframes provided are estimates based on the most current information available. Caltrans is committed to selling the properties as soon as possible.

Reference to the SR-710 North Study Relocation Impact Report (2014) was used to illustrate that three state owned parcels would be necessary for the proposed SR-710 North Study alternatives. Therefore, the SR-710 North Study Relocation Impact Report (2014) reference shall remain.

A-6-3

This comment requests to remove references to the SR-710 North Study. Reference to the SR-710 North Study Relocation Impact Report (2014) was used to illustrate that three state owned parcels would be necessary for the proposed SR-710 North Study alternatives. Therefore, the SR-710 North Study Relocation Impact Report (2014) reference shall remain.

With regard to the comment about cities receiving funds, Government Code Section 54237.7 allocates the proceeds of sales made by the Department for the purposes of providing repairs to properties sold at an affordable price, pursuant to Section 54237(b), and for certain transportation-related projects in the geographic area described as "Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and that portion of Los Angeles within the 90032 ZIP Code."

A-6-4

As requested in this comment, for clarification, the Need will reference where the regulations can be found in the environmental document (Appendix F). With regard to the comment about changing ASP to SPR (Sales Program Regulations), Caltrans will not revise the name of the regulations; while this property sale process would be implemented in compliance with the procedures outlined in the

Affordable Sales Program (ASP) Regulations, the ASP regulations are being drafted and finalized as part of a separate regulatory process, with a separate public input process.

A-6-5

Caltrans will not remove the language "...surplus parcels no longer needed..." in order to be consistent and comply with the ASP regulations.

A-6-6

This comment requests definitions of the words "reasonable", "feasible", and "prudent." Per CEQA Guidelines § 21061.1., "Feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. "Reasonable." Per, *Merriam-Webster.com*. Merriam-Webster, n.d. Web. 27 Oct. 2015, means fair and sensible: fairly or moderately good: not too expensive. "Prudent." Per, *Merriam-Webster.com*. Merriam-Webster, n.d. Web. 27 Oct. 2015, means having or showing careful good judgment.

A-6-7

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. Furthermore, Caltrans will not disclose the names of the current tenants and/or current occupants in the 710 properties.

As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the environmental document), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

A-6-8

This comment request to withdraw the DEIR and its technical studies. Caltrans respectfully disagrees with the comment and will not withdraw the DEIR and its technical studies.

A-6-9

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

As discussed Section S.3 Description of Proposed Action and 1.3 Overview of Proposed Action of the environmental document, the description does state the sales of improved property or property with a tenant will be sold through the ASP regulations. While this property sale process would be implemented

in compliance with the procedures outlined in the ASP Regulations, the ASP regulations are being drafted and finalized as part of a separate regulatory process, with a separate public input process. Furthermore, the ASP regulations can be found in Appendix F of the environmental document.

A-6-10

The Senate Bill 416, Government Code 54235-54238.7 (Roberti Bill) and the ASP Regulations discussed in the Action Description can be found in the appendices of the EIR. With regard to the comment about the No Action alternative, Section 1 15126.6(e)(1) of the CEQA Guidelines dictates that an EIR must include a discussion of the “no project” (“no action” for this EIR), alternative and its impact. The discussion of the “no project” alternative allows the public and the decision-makers to assess the effects of approving the project versus the effects of not approving the project.

A-6-11

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

This comment request that Caltrans provides “concordance.” The ASP regulations can be found in Appendix F of the EIR. While this property sale process would be implemented in compliance with the procedures outlined in the ASP Regulations, the ASP regulations are being drafted and finalized as part of a separate regulatory process, with a separate public input process.

A-6-12

Reference to the SR-710 North Study Relocation Impact Report (2014) was used to illustrate that three state owned parcels would be necessary for the proposed SR-710 North Study alternatives. Therefore, the SR-710 North Study Relocation Impact Report (2014) reference shall remain.

A Summary of Relocation Benefits can be found in Appendix B of the environmental document. Also, throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790. Questions can also be directed to your rental agent.

A-6-13

Reference to the SR-710 North Study Relocation Impact Report (2014) was used to illustrate that three state owned parcels would be necessary for the proposed SR-710 North Study alternatives. Therefore, the SR-710 North Study Relocation Impact Report (2014) reference shall remain.

With regard to the request to comparing The SR-710 North Study Relocation Report (2014) and the SR-710 Surplus Property Sales Draft Relocation Impact Report (2015) is not necessary; because, as mentioned above, the reference to the SR-710 North Study Relocation Impact Report (2014) was used to illustrate that three state owned parcels would be necessary for the proposed SR-710 North Study alternatives.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

A-6-14

All technical studies will be readily available upon request.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

A-6-15

The Los Angeles Times reference can be found at <http://maps.latimes.com/neighborhoods/neighborhood/el-sereno/>. The 2000 Census data in El Sereno was used in the DRIR because it was the most recent available data. Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

A-6-16

It is unclear what the comment is requesting, Table 4.4 Community Demographic Indicators in the DEIR used 2010 Census data for the three cities being analyzed in this environmental document.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

A-6-17

Section 1 15126.6(e)(1) of the CEQA Guidelines dictates that an EIR must include a discussion of the “no project” (“no action” for this EIR), alternative and its impact. The discussion of the “no project” alternative allows the public and the decision-makers to assess the effects of approving the project versus the effects of not approving the project.

A-6-18

Maps of the proposed alternatives for the SR-710 North Study can be found at http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/ under Project Alternative Maps

A-6-19

The Los Angeles City Council Resolution (2012) which can be found at http://clkrep.lacity.org/online/docs/2012/12-0002-S82_CA_08-28-12.pdf does not prohibit construction within or beneath the City of Los Angeles. The resolution opposes the proposed extension of the North Long Beach 710 Freeway and any above ground highway or freeway that would cut through the City of Los Angeles. The resolution will not affect the sale of the surplus properties.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

A-6-20

Government Code Section 54237.7 allocates the proceeds of sales made by the Department for the purposes of providing repairs to properties sold at an affordable price, pursuant to Section 54237(b), and for certain transportation-related projects in the geographic area described as "Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and that portion of Los Angeles within the 90032 ZIP Code."

A-6-21

The mitigation measures are included in the FEIR.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

The action being analyzed in the SR-710 Surplus Property Sales environmental document involves the sale of the surplus properties originally acquired by Caltrans. While this property sale process would be implemented in compliance with the procedures outlined in the Affordable Sales Program (ASP) Regulations, the ASP regulations are being drafted and finalized as part of a separate regulatory process, with a separate public input process.

A-6-22

It is unclear what T-1 measure this comment is referencing. The phases were determined by the division of right-of-way. Any timeframes provided are estimates and Caltrans is committed to selling the property as soon as possible. Caltrans is committed to selling the properties as soon as possible.

A-6-23

The action being analyzed in the SR-710 Surplus Property Sales environmental document involves the sale of the surplus properties originally acquired by Caltrans. While this property sale process would be implemented in compliance with the procedures outlined in the Affordable Sales Program (ASP) Regulations, the ASP regulations (Appendix F) are being drafted and finalized as part of a separate regulatory process, with a separate public input process.

A-6-24

The phases were determined by the division of right-of-way. Any timeframes provided are estimates and Caltrans is committed to selling the property as soon as possible. Caltrans is committed to selling the properties as soon as possible.

The action being analyzed in the SR-710 Surplus Property Sales DEIR involves the sale of the surplus properties originally acquired by Caltrans. While this property sale process would be implemented in compliance with the procedures outlined in the Affordable Sales Program (ASP) Regulations, the ASP regulations (Appendix F) are being drafted and finalized as part of a separate regulatory process, with a separate public input process.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-6-25

Section 4.4.4.2 Alternative 2—Action Alternative discloses that based on the general age of all the surplus properties (residential and commercial), it is likely that asbestos-containing materials and lead-based paint may be present. In addition, the proposed regulation section 1476(u) provide that hazards can be subsidence, flood, erosion, defect lead base paint or the like.

A-6-26

The Environmental Commitment Record can be found in Appendix E of the EIR.

This comment raises concern about the funds resulting from the sales, Government Code Section 54237.7 allocates the proceeds of sales made by the Department for the purposes of providing repairs to properties sold at an affordable price, pursuant to Section 54237(b), and for certain transportation-related projects in the geographic area described as “Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and that portion of Los Angeles within the 90032 ZIP Code.”

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-6-27

This comment is referencing S.5 Environmental Analysis, as this section is a summary of the findings. Please refer to 4.3 Cultural Resources to understand the basis of the statement in S.5 Environmental Analysis.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-6-28

Please see response to comment A-6-6

A-6-29

Sales of multi-residential properties shall proceed in accordance with Government Code Section 54237(d) and (e) which legislates the offering for sale of those properties to housing related public and private entities at a reasonable price.

In addition, the proposed regulation section 1476(r) and 1476(bb) provide the definition of Housing Related Private Entity and Reasonable Price. The regulations are in Appendix F of the DEIR.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-6-30

This comment deals with the General Plan of the City of South Pasadena. The city’s General Plan can be found at <http://www.ci.south-pasadena.ca.us/index.aspx?page=120>.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-6-31

Please see response to comment A-6-6

With regard to the comment requesting a definition of “non-environmental justice”, environmental justice is defined and discussed in 4.2.4.1. The prefix “non” means not of the kind or class described.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-6-32

The proposed regulation section 1476(r) and 1476(bb) provide the definition of Housing Related Private Entity and Reasonable Price. The regulations are in Appendix F of the EIR.

A-6-33

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-6-34

This comment requests definitions of the words “reasonable”, “significantly”, and “potential.”
"Reasonable." Per, *Merriam-Webster.com*. Merriam-Webster, n.d. Web. 27 Oct. 2015, means fair and sensible: fairly or moderately good: not too expensive. CEQA requires that an EIR identify the significant environmental effects of the project (CEQA Guidelines Section 15126), but does not promulgate specific thresholds for significance. Instead, CEQA Guidelines Section 15064(b) states that “the determination...calls for careful judgment on the part of the public agency involved...” and that “an ironclad definition of significant effect is not possible because the significance of an activity may vary with the setting.” CEQA encourages lead agencies to develop and publish their own thresholds of significance for the purpose of determining the significant effects of their projects. "Potential." Per, *Merriam-Webster.com*. Merriam-Webster, n.d. Web. 2 Nov. 2015, means existing in possibility: capable of development into actuality.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-6-35

"Reasonable." *Merriam-Webster.com*. Merriam-Webster, n.d. Web. 2 Nov. 2015. means fair and sensible: fairly or moderately good: not too expensive.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

Dr. Tom Williams / Citizens Coalition for A Safe Community

A-7

All of the above...

DEIR Sales of Surplus Properties

DATE: September 08, 2015, 4:30pm

TO: Affordable Sales Program, 1120 N Street, MS 37, Sacramento, CA 95814
Contact: Kimberly Erickson,
Lauren Wonder Phone: (213) 897-9092
e-mail: Affordable_Sales_Program@dot.ca.gov
www.dot.ca.gov/dist07/business/710sales

FROM: Dr. Tom Williams, Sr.Techn.Advis., Citizens Coalition for A Safe Community
Sierra Club, Angeles Chptr., Transportation Committee

SUBJECT: SR-710 Surplus Property Sales "Draft Env. Impact Report"
RE: Comments on DEIR for Sales of Surplus Property
Revised Deadline: "Affordable Sales Program Public Comment Period
Extended to September 8, 2015 (5PM)"

COMMENTS (Background without bold/italics; Comments/Requests with **Bolding and Italics**)

FEASIBLE

S-4/2 S.5 Environmental Analysis Other mitigation measures may be identified during public circulation of this DEIR and could be included if they are deemed **reasonable, feasible, and prudent.**

No definition of these terms and relationships to costs or property valuations and effects taken separately and together in various combinations.

Remove/revise/recirculate.

A-7-1

5-34/2 5.4 Determining Significance under CEQA CEQA requires Caltrans to identify each "significant effect on the environment" resulting from a project... **Each and every significant effect** on the environment must be disclosed in the EIR and **mitigated if feasible.**

No definition of "feasible" and relationships to costs or property valuations.

Remove/revise/recirculate.

A-7-2

5-35/1 5.4.1.2 Cultural Resources All variations of Alternative 2 will take **feasible steps** to ensure that the appropriate protective covenants are conveyed upon the sale of any historic resources. However, if the rights of refusal are exhausted and no buyer has been identified for a historic property due to the presence of a protective covenant associated with the property, **Caltrans will remove the covenant in order to successfully sell the property.** In this unlikely event, an adverse effect on the historical resource may result in a significant impact. **There are no mitigation measures currently proposed.**

Feasible is not defined with respect to rights of refusal and no buyers; as covenants and price are closely related a simple mitigation step for Caltrans would be to retain the covenants and place the property for sale by bid/auction.

Lack of financial considerations and mitigation are not appropriate or adequate consideration for the potential risk of damages and impacts to historic properties. Remove/revise/recirculate.

A-7-3

POSSIBLE REASONABLE

D-1/3 FAIR HOUSING The Fair Housing Law..., and as amended, makes discriminatory practices in the purchase and rental of most residential units illegal. Whenever **possible**, minority persons shall be given **reasonable opportunities** to relocate to any **available housing** regardless of neighborhood, as long as the replacement dwellings are decent, safe, and sanitary and **are within their financial means.**

Possible, reasonable, opportunities, and available are not defined and can be interpreted in many ways without fulfillment of the intent and meaning of the Fair Housing Law's provisions.

Remove/revise/recirculate.

A-7-4

D-3/1 RESIDENTIAL RELOCATION PAYMENTS The Relocation Assistance Program will help **eligible residential occupants by paying certain costs and expenses.** These costs are limited to those necessary for or

A-7-5

incidental to the purchase or rental of a replacement dwelling and actual reasonable moving expenses to a new location within 50 miles of the displacement property.

No provisions are related to the estimated displaced households and the potential mitigative/compensatory effect of such assistance.

Remove/revise/recirculate.

A-7-5

D-5/3 Moving Expenses Moving expenses may include the following actual, reasonable costs:

D-5/3 ...Expenses related to searching for a new business site, up to \$2,500, for reasonable expenses actually incurred.

D-5/4 Reestablishment Expenses Reestablishment expenses related to the operation of the business at the new location, up to \$10,000 for reasonable expenses actually incurred.

No definition of "reasonable" is provided and examples of its application by Caltrans to the estimated 148 displaced households. Remove/review/revise/recirculate.

A-7-6

S-5/ Table S-1. The ASP regulations process is happening concurrently with this EIR process and is striving to ensure that those tenants who desire to purchase their single-family homes will be afforded every possible opportunity to do so.

4-69/2 4.2.1.5 Avoidance, Minimization, and/or Mitigation Measures The Affordable Sales Program (**ASP**) regulations process is happening concurrently with this Environmental Impact Report (EIR) process and is striving to ensure that tenants...to purchase their single-family homes will be afforded every possible opportunity to do so.

Various different combinations of the ASP, ASP regulations, and ASP regulations process either must be separately defined and/or clearly defined for a single process. As a process applied to the SR-710 Surplus Properties, the process is in fact the "Project" for the purposes of this DEIR and CEQA process. Establish a single use and acronym for the "Project" or "Action": "ASPR-process".

No definition or specific application is provided for "afforded every possible opportunity" to illustrate its importance and its relationships to the effects and mitigation.

Remove/review/revise/recirculate.

A-7-7

Additionally, the current ASP regulations propose that the purchaser of a multifamily residence will rehabilitate and develop the property as limited equity cooperative housing or it will be used for low- and moderate-income rental or owner-occupied housing, with the present occupants afforded the first right of occupancy.

Current regulations are drafts and open to comments and revisions and will be so until after the conclusion of public comments for this DEIR as one version is included but not yet finalized. Therefore the entire DEIR must be withdrawn, reviewed, revised, and after the regulations are finalized.

Change of use from ASPRegProcess to just "regulations" requires clarifications, definitions, and specific meanings. Remove/review/revise/recirculate.

A-7-8

5-24/3 The Affordable Sales Program (**ASP**) regulations process is happening concurrently with this Environmental Impact Report (EIR) process and is striving to ensure that those tenants who desire purchasing their homes will be afforded every possible opportunity to do so, thereby limiting the possibility of changing the community demographics and character. Additionally, higher rates of homeownership generally positively correlate with a higher level of community cohesion, benefiting the communities and neighborhoods in which the surplus properties are located.

Regulations and process remain subject to change as the current draft regulations have been open to public comments and have not been "finalized" as the "Project/Action" for this DEIR..

Remove/revise/recirculate for all references to ASP, ASP regulations, ASP regulations process, and the "Project" or "Action".

A-7-9

5-27/3 These measures are included to ensure that the ASP achieves its purpose of fostering homeownership for persons of low or moderate income to the highest degree possible, while also not impeding the ability of said persons to gain equity.

ASP purposes/needs have not been stated to include "fostering homeownership".

Definitions or application/examples of "fostering" or "highest degree possible" have not been provided within the DEIR which renders the DEIR incomplete and inadequate. Remove/review/revise/recirculate.

A-7-10

5-28/1 Therefore, cumulatively considerable impacts under Variation B Options 1 and 2 will be minimized to the greatest extent possible.

Definitions or applications/examples of "minimized" or "greatest [versus 'highest'] degree possible" have not been provided within the DEIR which renders the DEIR incomplete and inadequate. Remove/review/revise/recirculate.

A-7-11

PAL 4-83/3 Of the 460 properties in the PAL, a total of 113 properties are historical resources. There are...10 properties [**9% of total**] in...Los Angeles that are listed in or determined eligible for listing in the National Register. **PAL has not been defined nor delineated and not related to the various "phased" properties and to specific designated historic structures. Remove/review/revise/recirculate.**

A-7-12

S-5/Table S-1 Relocations No Impact There are 148 households anticipated to be displaced. **R-1** To increase the potential for occupants to obtain financing to purchase, and thereby avoid and minimize the number of people displaced,...Caltrans) is working with the California Housing Finance Agency to make more financing products available to prospective buyers than are currently readily available in the general lending market.

Although a very specific number of households (not up to or about or approximately 148) has been "anticipated" for displacement, the definitions, specific measures, enumeration, or applications/examples of "increase", "avoid and minimized" or "currently readily available" have not been provided within the DEIR which renders the DEIR incomplete and inadequate. Remove/review/revise/recirculate.

A-7-13

S-5/Table S-1 Occupants who do not purchase will be provided advisory assistance to find and relocate to comparable housing...

...Caltrans will seek assistance from agencies such as the United States Department of Housing and Urban Development (HUD) to find affordable housing.

Advisory assistance, comparable, and "seek assistance" are not defined, quantified, specified, or explained and would be expected to have a very wide range of possibilities when directly applied to the estimated 148 households; explanations and examples have not been provided within the DEIR which renders the DEIR incomplete and inadequate. Remove/review/revise/recirculate.

A-7-14

4-71/3 Also,...assumed that, of the occupied residential properties not purchased by housing-related entities (all single-family residences), approximately 100 will be sold at affordable prices to current occupants. The remaining 148 single-family properties will be sold at fair market value to non-occupants, thus resulting in 148 anticipated displaced households.

Although 148 households have been classed for displacement, the "calculation" of this number has not been clearly enumerated and demonstrated as to the process and specific actions and households/properties involved within the DEIR which renders the DEIR incomplete and inadequate. Remove/review/revise/recirculate.

A-7-15

4-71/4 Table 4.5...proposed regulations require Caltrans to prioritize fair market offers to nonresidential parcels: first to former owners, then to current tenants in good standing. Based on the feedback during the rulemaking process for the ASP regulations and (lack of) inquiries made to Caltrans from former owners,...anticipated that former owners of nonresidential properties will not be interested.

Reference to "proposed regulations" and then "ASP regulations" without clear statement that they are in fact the same but using different wording, here and elsewhere confuses the entire DEIR and the ASP regulatory process which is the proposed "Project", sale of surplus properties. Such confusion appears purposeful and defeat the CEQA purposes related to a public document and for soliciting public comments. Such purposeful confusion renders the DEIR incomplete and inadequate under CEQA requirements. Remove/review/revise/recirculate.

A-7-16

4-71 Table 4.5 Anticipated Displacements Type of Residences Units/Households Displaced¹

Single-Family Residences 148 1/ Based on the number of single-family residential units estimated to be sold to private individuals or entities other than existing tenants or housing-related public and private entities, as described in SRIA; excludes vacancies. SRIA= Standardized Regulatory Impact Assessment

A-7-17

Although a very specific number of households (not up to or about or approximately 148) has been "estimated" for eventual displacement, the process of estimation has not been provided within the DEIR which renders the DEIR incomplete and inadequate. This process represents the implementation of the proposed "Project/Action", the "ASP Regulatory Process". Remove/review/revise/recirculate.

A-7-17

THE REGULATIONS

The DEIR and the Draft Regulations are directly linked by the latter's inclusion in the DEIR and repeated references to the "ASP regulations" which establishes the terms, conditions, requirements, and processes of the Project/Actions as implemented for the Project Area. The ASP regulations must be incorporated into the "Project Description" and the Purpose and Need for the Project/Action. As the ASP regulations are the administrative implementation of the various legislative measures and related codes and are specific to the Project Area, the "ASP Regulations" and their implementation are in fact the "Project" or the "Action" subject to CEQA.

A-7-18

Regulations and the project presume that any excess revenues generated by property sales will be placed into a separate account, and this account may be allocated to cities within and beyond the communities subject to the surplus properties sales.

Inclusion of Alhambra and LaCanada-Flintridge for receiving excess sales revenues appears totally unreasonable and must be mitigated. Mitigation must include the assignment of excess sales funds based on their generation and the properties not sold to non-previous-owners or non-tenants.

A-7-19

Revise regulations and limit allocation of "excess funds" to those areas which have suffered directly from the tenancy under Caltrans.

Remove/review/revise/recirculate.

1475 Purposes and Scope

important public purpose. The Legislature intended by passage of the Act to dispose of such surplus residential properties in a manner that will preserve, upgrade and expand the supply of housing available to affected persons and families of low or moderate-income.

A-7-20

1475 (a)

The regulations include both elements for the implementation of the legislation and for other activities originating from/by Caltrans. The draft must be revised in order to clearly show and demonstrate the origin of statements contained therein and differentiate between those sourced from legislation, those from other Codes, and those originating in Caltrans.

Remove/review/revise/recirculate.

710 (SR 710), in Los Angeles County. The regulations specified herein and the governing statutes are collectively known as the "Affordable Sales Program."

1475 (b)

The ASP Regulations for the basis of all anticipated actions for the sales and thereby form the basic foundation of the proposed action and project considered within the Draft Environmental Impact Report for the same "Action". As both the Draft Regulations and the DEIR fail to clearly establish the CEQA process and its application, provide a clarification for such either within the regulations, definitions, or as an attached explanation.

A-7-21

The Project of the DEIR is the approval and implementation of the regulations under the authority granted and approved by the California Transportation Commission which is the only discretionary body involved in the "project/action".

Remove/review/revise/recirculate.

1476 Definitions

Six pages of definitions many without reference to standard real estate and property standards render any terms without references as arbitrary and without certainty of application and consistency with the real estate industry. Further such changes render the regulations unintelligible for the public and those that will be most influenced. Provide all definitions with confirming references to recognized in the real estate sector and separate those as defined by "Caltrans".

A-7-22

↑ A-7-22

Remove/review/revise/recirculate.

1477 (a) residential property...order of priority and condition

1477(a)(1) tenants in good standing **Why tenants in good standing which implies that Caltrans and prior actions determines "standing" which is not defined and not verifiable based on past records. As no process, criteria, or other defined elements are provided for "good" vs "standing" vs bad/poor standing are provided the entire element and relationships of "Standing" must be defined and shown how they will be established and used in establishing prospective eligibility for purchasing of properties.**

A-7-23

Remove/review/revise/recirculate.

(2) Occupants affordable price or approved appraised fair market value price **are poorly defined and not specifically reflected in the referenced legislation and codes, therefore reflects only the opinion of Caltrans. Clarify or remove and reevise.**

A-7-24

(iv) ownership interest **Term is not defined.**

(3) area median income **Area is not defined and includes many precincts which are widely different from the "project" area as focused on by the related legislation and regulations - north of Alhambra Rd., west of Winchester, south of Huntington, and east of Eastern in El Sereno (exclude: Monterey Hills, Hillside Village, and University Hills from inclusion).**

A-7-25

(iv) ownership interest: **Term is not defined.**

Remove/review/revise/recirculate.

(4) **reasonable** price - "best suited to the economically **feasible** use"

(i) if it is **feasible** (ii) if it is **not feasible**

Also "feasible" - commercially reasonable market analysis...paid by the entity, factors-location, numbers, tenant interests resources for operations [?including maintenance] financing.

Feasibility and reasonable are not defined and formulated and therefore is subject arbitrary development beyond these regulations. Remove or provide definitions and basis for calculations.

A-7-26

(5) Fair market value - current/former tenants as Own.Occupt. open bid-as O/O

(b) **Revise and add:** shall be made that exclude any qualified **current** tenant.

(g) properties sold re without warranty **Clarify as to whether this is the same as "AS IS" and establish as to whether this is acceptable to lending agencies within or adjacent to the Project Area.**

A-7-27

Remove/review/revise/recirculate.

1478 (b) (3) Department **may**..."as is" condition...at an affordable price

(4) ...Department **may** elect...shall...shall

(6) ...Department **may** take such action...

(7) In no event shall the affordable sales price be less than the original acquisition price paid by the Department.

A-7-28

c 4 ...Department **may** take such actions to enforce its rights

c 5 Same as b 7 above

Provide clarifications as to when/how "may" would be applied rather than "shall" as used elsewhere. Change to "shall".

Remove/review/revise/recirculate.

PROJECT/ACTION DESCRIPTION

Chapter 1 Proposed Action(s) is totally inadequate and incomplete with regard to the description of the proposed project/action, application of CEQA with regard to a required discretionary action, identification of organization for certifying the FEIR and approval of the project/action, and associated physical changes resulting from a discretionary actions.

A-7-29

The proposed actions are the preparation, "finalizing" (=Approval), and implementation of the requirements found in the "Affordable Sales Program (ASP) regulations". Compliance with

↓

regulations does not represent a discretionary action, while the approval of regulations must be considered as a discretionary action for the implementation of legislation and related codes. Although regulations are suppose to provide certainty and consistency for the application of the laws, some discretion appears to be incorporated in the implementation of the ASP regulations and therefore, the DEIR must apply to both the development of the ASP regulations and the implementation of the regulations to this specific group of properties.

A-7-29

Section 1.1 only discusses the Action Background (subsec. 1.1.1) without a separate subsection for the actual "project" or "action". References are made to many codes and legislation but does not mention/cite the "Affordable Sales Program **[Regulations]**, Chptr. 9.5, Div.2, Title 21 (Apdx.F; identified as "Proposed Regulations", header, Apdx.F-1).

A-7-30

The entire Project Description requires withdrawal from circulation and comments, revisions to properly reflect the "Project" including the regulations and the implementation of the proposed regulations for the subject properties, and eventual recirculation for public review and comments of both the ASP regulations and their application to the SR=710 properties.

Section 1.4 (unnumbered table) indirectly identifies Caltrans as the "lead agency" which will certify the FEIR and finalizing ASP regulations for the sales; however, the same section identifies that the California Transportation Commission (CTC) as the agency for final approval of the sales/conveyance and Caltrans' implementation of the ASP regulations.

As indicated in the Section 1.4 table, Caltrans is also proposed as the "lead agency" for preparing the regulations which will govern the sales of the properties, although no discretionary decisions are reflected in the preparations of the regulations.

A-7-31

As the CTC has the final approval and is a discretionary body, the certification or the FEIR, implementation funding, and approval of conveyance must be assigned to the CTC, rather than to Caltrans which represents the "applicant", the "FEIR preparer", and both the "certifier" and "approver" of the FEIR and Regulations. As CTC has ultimate authority over Caltrans, funding, and approvals of the conveyance of the properties and is a discretionary body, CTC must be assigned as "lead agency" for certification the FEIR and approval this project/action.

1-13/1 The SR-710 Rehabilitation Account is continuously refilled with each sale. When the balance of this account reaches \$500,000, additional proceeds go to the State Highway Account for allocation by the California Transportation Commission (CTC) to be used exclusively for projects located in Pasadena, South Pasadena, Alhambra, La Cañada Flintridge, and the 90032 Zip Code area of Los Angeles (El Sereno).

A-7-32

The DEIR does not consider the impacts of assignment of financial resources from the directly affected communities to those which have no affected properties and would not otherwise benefit from the implementation of the ASP Regulatory Process within the three affected communities. Financial resources must be focused entirely on improvements in the three affected communities and not in those which have not been directly affected.

pdf 278 Appendix A SB 416 Chptr. 468 ... transferred to the State Highway Account in the State Transportation Fund to be used for allocation by the California Transportation Commission (commission) exclusively to fund projects located in Pasadena, South Pasadena, **Alhambra, La Cañada Flintridge**, and the 90032 postal ZIP Code. Projects shall be selected and prioritized by the affected communities in consultation with the Los Angeles County Metropolitan Transportation Authority, pursuant to guidelines developed by the commission. The Los Angeles Metropolitan Transportation Authority shall submit a proposed program of projects and the commission shall have final authority to approve the projects. Eligible projects may include, but are not limited to: sound walls; transit and rail capital improvements; bikeways; pedestrian improvements; signal synchronization; left turn signals; and major street resurfacing, rehabilitation, and reconstruction. The funds shall not be used to advance or construct any proposed North State Route 710 tunnel.

A-7-33

Any funds remaining in the SR-710 Rehabilitation Account on the date that final payment due for the last of the properties repaired has been made, less any reimbursements due to the federal government, shall be transferred to the State Highway Account in the State Transportation Fund, to be used exclusively for the purposes described in this section.

The DEIR does not consider the impacts of assignment of financial resources from the directly affected communities to those which have no affected properties and would not otherwise benefit from the implementation of the ASP Regulatory Process within the three affected communities. Financial resources must be focused entirely on improvements in the three affected communities and not in those which have not been directly affected.

A-7-33

Appendix G List of Technical Studies

Community Impact Assessment (May 2015). Prepared by LSA Associates, Inc.

Cumulative Impacts Assessment (April 2015). Prepared by Caltrans.

Draft Relocation Impact Report (April 2015). Prepared by Caltrans.

DRIR

Hazardous Waste Assessment—Excess Properties (February 19, 2014). Prepared by Caltrans.

Hazardous Waste Assessment—Excess Properties (February 27, 2014). Prepared by Caltrans.

Hazardous Waste Assessment—Vacant Lots and Public Facility (October 2014). Prepared by Caltrans.

Hazardous Waste Assessment—Residential (November 2014). Prepared by Caltrans.

Hazardous Waste Assessment—Industrial (February 2015). Prepared by Caltrans.

Historic Resource Compliance Report, Volume I – Historic Properties (March 2015). Prepared by Caltrans.

Historic Resource Compliance Report, Volume II – Non-Historic Properties (March 2015). Prepared by Caltrans.

Natural Environment Study Minimal Impacts (October 2014). Prepared by Caltrans.

Separation of technical studies from other referenced documents causes confusion and sourcing of supporting documents for considerations and comments. All documents must be provided in a single reference section rather than separated in different sections.

A-7-34

S-5 Table S.1 Summary of Potential Impacts from Alternatives Item 3

Relocations No Impact There are 148 households anticipated to be displaced.

R-1 To increase the potential for occupants to obtain financing to purchase, and thereby avoid and minimize the number of people displaced, the **California Department of Transportation (Caltrans) is working with the California Housing Finance Agency to make more financing products available to prospective buyers than are currently readily available in the general lending market.** Occupants who do not purchase will be **provided advisory assistance to find and relocate to comparable housing**, and Caltrans will seek assistance from agencies such as the United States Department of Housing and Urban Development (HUD) to **find affordable housing.**

A-7-35

The entire DEIR does not provide any specific measures regarding financial measures (or "products") that would be available for occupants/tenants and for those who may be displaced from their rental properties. Similarly "advisory assistance" has not been defined and requirements specified. Therefore, no mitigative/compensatory value can be assigned or considered. The DEIR is incomplete and inadequate, and significant adverse community impacts could occur without mitigation to less than significant levels. The DEIR requires review/revision/recirculation with adequate and complete definitions and specific provisions for mitigation or compensation for adverse effects.

5-24/3 The Affordable Sales Program (ASP) regulations process is happening concurrently with this Environmental Impact Report (EIR) process and is striving to ensure that those tenants who desire purchasing their homes will be **afforded every possible opportunity to do so**, thereby limiting the possibility of changing the community demographics and character.

A-7-36

As the ASP regulations are not finalized and an additional draft is expected, the process is not concurrent with the EIR process, it is in fact the "Project" or the "Action" of the DEIR and FEIR which are subject to review and comment as part of the EIR/CEQA public review/comment process.

B. Limits and Purposed of Project:

Upon formally adopting ASP regulations, Caltrans intends to meet the goals...

A-7-37

Limits and Purpose of Project:

Streets and Highways Code section 118.6 states that the California Department of Transportation (Caltrans) to the greatest extent possible, will offer to sell or exchange property that has been determined by Caltrans to be excess to their needs. Government Code sections 54235 through 54238.7 known as the Roberti Act, as amended by Senate Bill 416 in 2013, includes priorities for disposal of residential properties originally acquired for the State Route 710 (SR-710) extension in the cities of Los Angeles, South Pasadena, and Pasadena and includes requirements that the agency impose terms, conditions, and restrictions to ensure that housing remain available for low or moderate income households. Upon formally adopting Affordable Sales Program regulations, Caltrans intends to meet the goal of the legislature to dispose of surplus properties originally acquired for the SR-710 extension while preserving and expanding the availability of low and moderate income housing.

Reference to the "Greatest Extent Possible" has not been defined and would presume to mean all properties without restrictions as to valuations and period of scale but with the Roberti Amendment an unknown prioritization is introduced as "to remain available for low and moderate income households". These conditions are established and in place as part of the existing conditions of the affected area. Then "upon formally adopting....regulation" finally introduce the "project", "the action, without indicating what discretionary approval is required and by whom this discretionary approval would be voted on.

A-7-37

No definition or specifics are provided for the Caltrans "intent" (intends to) and the regulations do not establish a demonstration of intent through maps which specify which properties are assigned to which phase, and to which SR-710 Alternative or even the "No Project" which includes project actions affecting properties subject to the ASP regulations at Alhambra Ave./Lowell/Concord.

Mention is made of EXPANDING availability of low -moderate income housing without definitions or specifics. One alternative must include conversion of all vacant properties to low-moderate income single-family housing where a) two or more adjacent properties are currently occupied by single-family or are zoned for single-family residences and b) where two or more adjacent properties are currently occupied by or are zoned for commercial uses which include multi-family residential structures.

A-7-38

ASP/Regulations

The only "Action" or Project is the implementation of the proposed/draft Affordable Sales Program (ASP) and described in the proposed/draft regulations currently under review/revision and no yet defined as adequate and complete.

Reference to the ASP is totally in error and inadequate as no formal completed and approved document is presented, only a draft. Differing titles and insertions without clearly referencing the date of the draft

A-7-39

TOC-iii Appendix F Proposed Affordable Sale Program... and pg. F-1 Proposed Affordable Sale Program...in the singular without mention as to being regulations compared to first Summary use (S-2/2), then TOC-ix, and then text use (1-8/4) all use the plural: "Sales". Revise and recirculate with consistent usage for all important terms.

A-7-40

S-1/3 S.2 Purpose and Need Purpose This action intends to offer the surplus properties that are not impacted by the project alternatives being evaluated in the SR-710 North Study Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS)... pursuant to Senate Bill (SB) 416 and the Roberti Bill. The...S-4/1...Caltrans may offer to sell the vacant lots pursuant to Streets and Highways Code Section 118.6, which allows properties to be offered by auction, sealed or continuous bid to the public, or by a sale or exchange to public agencies. Any improved property or property with a tenant will be sold through the proposed ASP regulations, Roberti Bill, and **SB 416**.

Revise and recirculate the DEIR clearly stating at all usage that the ASP regulations are the "Action"/Project of this DEIR and that the July Draft of the ASP regulations are assumed to be the "Project" and may be subjected to modifications prior to finalizing the FEIR.

A-7-41

Clearly define the Project as the sale of property in accordance with the proposed ASP Regulations (ASPRs).

No map is presented or referenced as to delineating the boundaries of various elements of the Study alternatives with direct regard to the parcels herein and as to which alternatives affect which parcels. Revise and recirculate with added appropriately scaled maps showing the boundaries of all parcels and all Study Alternative Elements affecting all parcels subject to this DEIR.

A-7-42

1-8/34 **1.2 Purpose and Need 1.2.1 Purpose** This action intends to offer surplus properties not impacted by the project alternatives...to housing entities, previous owners, current tenants and occupants...pursuant to SB 416 and the Roberti Bill...intended to provide needed affordable housing in the subject area and to remove Caltrans from its property management role with these properties.

A-7-43

Herein the statement removes the ASPRs from the pursuance while retaining ASPR under the scope of "Action". Remove/review/revise/recirculate.

1-8/4 **1.2.2 Need** The Caltrans need for the proposed SR-710 Surplus Property Sales include: Complying with SB 416, the Roberti Bill, the Affordable Sales Program (ASP), and Streets and Highways Code Section 118.

A-7-44

Revise ASP to ASPRs. Provide detailed description of the components of SB416, Roberti Bill, and Code and how they are specifically incorporated into the ASPRs or are separately applied to these Sales. Remove/review/revise/recirculate.

7-2/4 **7.2.2 City of Pasadena Consultation**

Some parcels included within the scope of this action are unimproved and vacant and have therefore been offered to their respective city in accordance with Streets and Highways Code 118.6. They are not subject to the Affordable Sales Program (ASP) regulations, but are included in this document in order to examine the potential environment impacts of the entire action. The parcels that fall under this exception that are within the City of Pasadena are:

A-7-45

7-3/2 **7.2.3 City of South Pasadena Consultation** Some parcels...have therefore been offered to their respective city in accordance with Streets and Highways Code 118.6...not subject to ASP regulations, but are included in this document in order to examine the potential environment impacts of the entire action...

For the purposes of sale of surplus properties the DEIR states that the combination of several laws, draft/approved regulations, and codes apply, not just a single, or lesser combination than the complete set. Offering of SR-710 affected properties without application of all administrative elements renders the DEIR as incomplete and inadequate with regard to those properties subject to a reduced administrative basis.

7-3/4 **7.2.4 Community Outreach and Information Meetings** Caltrans...outreach in order to solicit public comment and input on the draft regulations that would outline how the surplus properties would be sold under the ASP program. That effort is being conducted separately from this environmental document.

7-3/5 On May 30, 2014, Caltrans released the first draft of the proposed ASP regulations...Caltrans Division of Right of Way also facilitated public hearings for...comment on the proposed regulations, consistent with the requirements of...Administrative Procedures Act....At the hearings,...present comments, objections, and/or recommendations relevant to the proposed ASP regulations....All comments...part of the official record and will be addressed according to the Office of Administrative Law's policy and procedures...part of the ASP regulation process.

A-7-46

7-4/2 In response to...comments...proposed ASP regulations and resubmitted them for a public comment period...

Draft regulations are the basis for the "Project" as the regulations once finalized and approved would be the basis for implementation which may result in adverse and significant environmental impacts as indicated in this DEIR. Assumed separation of the project development from the preparation of the CEQA environmental documents renders the DEIR as both inadequate and incomplete with regard to the Project description, prospective mitigation or compensatory measures for significant impacts, and the entire approval/certification process.

Therefore all mitigation/compensation measures must be incorporated into the "ASP Regulations" as part of their final-final approval or the current ASP Regulations must be further amended before ✓

being "final".

All regulations and the "Project Approval" must be conducted as a discretionary process through and under the California Transportation Commission.

Remove/review/revise/recirculate.

A-7-46

APPENDIX F As Appendix F is a previous draft of the ASP Regulations but is included in this DEIR, it becomes subject to review and comments regarding the proposed "Project", = Action, = implementation of Draft Affordable Sales Program regulations/regulatory process:

1. Extension - Request extension to same date as DEIR Comments

Current extension was only announced after the earlier August 14, 2015 deadline was passed, and no direct communications were made to those that had submitted comments in accordance with the earlier deadline. This error represents a continuing policy and process of Caltrans to preclude public participations and may require other actions on the part of the Public.

As the proposed regulations are incorporated into the Draft Environmental Impact Report for the Sales of Surplus Properties in the SR-710 corridor and is subject to review and comment as part of the DEIR public process, separation of these comments from those of the DEIR is irresponsible to the policy and process for such review and CEQA. Inclusion of references and inclusions of related legislation, laws, and existing codes in the DEIR has no direct CEQA relationships as they have already passed through the CEQA process, while the implementation of the proposed regulations and their adverse community effects have not passed through this current CEQA process. The effects of implementing the proposed regulation must be subject to CEQA and must be included as the proposed "Project" (Actions). Therefore the Regulations must be part of the part of the DEIR and subject to public review and comments in accordance with CEQA and approval/certification of the FEIR and the Mitigation Monitoring and Reporting Plan and later discretionary approval of the FEIR and the Project (implementation of proposed regulations and MMRP).

As stated by Caltrans: "Questions about the sales process: will begin after regulations are approved and adopted this fall." appears to continue the attempt of separation of the implementation of the proposed regulations from the "Project" ("Actions") under review of the DEIR.

Extend the deadlines for the proposed current and future Sales Regulations drafts to accord with those of the CEQA process, certification, and final Project approval.

Remove/review/revise/recirculate. Regulations must not become final until the FEIR has been certified and for the 30 day review period following the certification by the California Transportation Commission.

A-7-47

2. Separation of Regulations from DEIR Project Description and Actions

Proposed regulations are the only anticipated actionable document or plan requiring discretionary approval related to the CEQA documents for Sales of Surplus Properties in the SR-710 Corridor. Discretionary Approval of Regulation appears to be unclear and maybe by Caltrans or California Transportation Commission. However, Caltrans is an Administrative Body and is regulated by regulations and legislation/laws approved by the California State Legislature and California Transportation Commission. Virtually all Sales related discussion has precluded references to the parallel CEQA process regarding the effects of "Action" of the sales of surplus properties as required by these proposed Sales Regulations herein under review.

Clearly and explicitly incorporate the proposed regulations as the "Project" ("Action") within the current DEIR. Clearly provide the process for finalization of the DEIR, for preparation of the mitigation, monitoring, and reporting plan within the FEIR, for certification of the Final EIR, and for the California Transportation Commission's discretionary approvals of the certification of the FEIR and implementation of the final draft of the proposed regulations.

Remove/review/revise/recirculate.

A-7-48

3. Regulations do not reference any documents for the delineation of properties to be sold under the different phases and project boundaries. Some properties are assigned to phases without reference to the implementation process by which Caltrans has taken the current draft regulations and other non-public documents and arrived at six (6) El Sereno, three (3) Pasadena, and 33 South Pasadena properties (being available for sale in Phases 1a and 1b) and "Estimated 148 households" (not up to, not about, but 148, not 145, not 150) to be displaced with full implementation of the proposed Sales Regulations. Such examples

A-7-49

clearly demonstrate implementation has been "estimated" without providing the "estimating process" and all documents included to demonstrate the validity and appropriateness of their "estimates" either as part of the background materials for the regulations or as part of the implementation process in the DEIR.

All current "estimates" and their "estimating" process and bases must be provided as part of the proposed regulations and included as part of the "Project/Action Description" of the DEIR. Without such no regulatory process and its effects can be adequately and completely understood, reviewed, and commented upon.

Remove/review/revise/recirculate.

A-7-49

4. Sec. 1477 Conditional Offer Prior to Sale

Subsection (d) "...may solicit..."

Use of "may solicit" requires provision of definition and itemization as to what constitutes grounds and requirements for choosing to solicit bids and proposals from "entities" and provide any appeal process and requirements if other eligible "entities" including current and past tenants, expressly request to submit bids and proposal for such prospective sales.

Remove/review/revise/recirculate.

A-7-50

5. Sec. 1488 and Sec. 1489 Differences of "May" and "Shall"

Subsection (f) "Purchase funds must come..."

Remove "must" as inappropriate and inconsistent for regulatory instructions and contract documents and Replace with "shall". Such use and later "must" or "may" highly suggests that the regulations should be reviewed and revised by competent staff, experienced in contracts and regulations development and implementation.

Remove/review/revise/recirculate.

A-7-51

6. Sec. 1478 (d)(1)(C) "...entities will be monitored..."

Remove "will" as inappropriate and inconsistent for regulatory instructions and contract documents and Replace with "shall". Such use and later "must" or "may" highly suggests that the regulations should be reviewed and revised by competent staff, experienced in contracts and regulations development and implementation.

Remove/review/revise/recirculate.

A-7-52

7. 1486 (d) Contract for Sale also 1475 Purpose and Scope; 1476 Definitions - Reference to CTC

As all contracts: "...for sale...are [=shall be] subject to **CTC approval**" the entire basis for Title 21 Div. 2 Chptr. 9.5 Sec. 1475 - 1491 is founded herein the approval of sales, without stated exception, by the California Transportation Commission, discretionary body, and not solely or separately the Department. Therefore the approval of the Regulations, in total, must be based on the discretionary approval by the CTC and thereby is subject to CEQA and requirements of the CEQA process.

The term: CTC is not referred to elsewhere in the regulations, and is not defined, nor the acronym stated in the first usage...Sec. 1486 (d).

Since all transfers mentioned elsewhere are in fact "sales" use of "transfers" rather than "sales" appears to be an attempt to avoid or distract the reviewers from this provision.

The proposed Project for the DEIR related to the sale of surplus properties in the SR-710 corridor and its consideration for certification and approval must be approved by CTC, California Transportation Commission.

Change all references to "transfers" and insert the replacement "sale".

Remove/review/revise/recirculate.

A-7-53

8. Sec. 1481 "Must"

Remove "must" as inappropriate and inconsistent for regulatory instructions and contract documents and Replace with "shall". Such use and later "may" highly suggests that the regulations should be reviewed and revised by competent staff, experienced in contracts and regulations development and implementation.

Remove/review/revise/recirculate.

A-7-54

9. Sec. 1487 "May"

A-7-55

In 1487, Draft Regulations (DR) states: "...the Department may...grant..." without definitions and process as to how the Department shall decide under a "may" conditional implementation versus that with "shall" certainty.

A-7-55

Provide definition and itemization as to what constitutes "good cause" and any appeal process and requirements if the Department "...at its sole discretion..." chooses not to grant an extension.

10. Sec. 1488 and Sec. 1489 Differences of "May" and "Shall"

In 1488, Draft Regulations (DR) states: "...the Department may require..." while in 1489 the DR states: "...value shall be monitored..." without definitions and process as to how the Department shall decide under a "may" conditional implementation versus that with certainty. Although the latter "shall" implementation does not define "monitoring" and the process to "ensure" compliance. Similarly under 1488, no process is provided for an appeal for any "Department's determination of noncompliance" which may or may not be enforced by the initial statement of the section.

A-7-56

Revise and clarify conditions required for enforcement or not enforced.

Provide certainty and consistent application of the regulation and its requirement.

Provide process and grounds for appeal from "Determination of Noncompliance".

Provide the means of monitoring and require notice of such monitoring be provided to all of those to be monitored prior to the annual monitoring and the means of appealing or refuting any inaccurate monitoring findings.

Remove/review/revise/recirculate.

A-7-1

This comment requests definitions of the words “reasonable”, “feasible”, and “prudent.” Per CEQA Guidelines § 21061.1., “Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. “Reasonable.” Per, *Merriam-Webster.com*. Merriam-Webster, n.d. Web. 27 Oct. 2015, means fair and sensible: fairly or moderately good: not too expensive. “Prudent.” Per, *Merriam-Webster.com*. Merriam-Webster, n.d. Web. 27 Oct. 2015, means having or showing careful good judgment.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-7-2

Per CEQA Guidelines § 21061.1., “Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-7-3

Please refer to response to comment A-7-2

A-7-4

This comment request definitions of the words Possible, Reasonable, Opportunities, and Available as used in The Fair Housing Law in Relocation Assistance Program Benefits. These terms will be interpreted as they are defined in The Fair Housing Law. The Fair Housing Law can be found at http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-7-5

The Summary of Relocation Benefits in boilerplate language. Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. For those who are relocating and are eligible, Government Code Section 54238.3(b) sets forth the relocation benefits and advisory assistance to be offered; which can be found in Appendix B. Caltrans is currently exploring several options to engage outside assistance in the disposal and financing of the properties.

A-7-6

The Summary of Relocation Benefits in boilerplate language. Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. For those who are relocating and are eligible, Government Code Section 54238.3(b) sets forth the relocation benefits and advisory assistance to be offered; which

can be found in Appendix B. Caltrans is currently exploring several options to engage outside assistance in the disposal and financing of the properties.

Please see response to comment **A-7-4**.

A-7-7

The action being analyzed in the SR-710 Surplus Property Sales environmental document involves the sale of the surplus properties originally acquired by Caltrans. While this property sale process would be implemented in compliance with the procedures outlined in the Affordable Sales Program (ASP) Regulations, the ASP regulations are being drafted and finalized as part of a separate regulatory process, with a separate public input process.

As stated in the List of Acronyms and Abbreviations page in the environmental document, ASP stands for Affordable Sales Program. It is Caltrans policy to spell out the acronym in each section first before using acronym.

With regard to the comment about the minimization measure, "The ASP regulations process is happening concurrently with this EIR process and is striving to ensure that those tenants who desire to purchase their single-family homes will be afforded every possible opportunity to do so." Government Code Section 54237 sets forth the priorities for sale. If a tenant does not qualify to purchase at an affordable price, they may have an opportunity to purchase the property at fair market value. A change would require legislation. Caltrans is working with the California Housing Finance Agency to identify lending options for affordable purchasers.

A-7-8

The action being analyzed in the SR-710 Surplus Property Sales environmental document involves the sale of the surplus properties originally acquired by Caltrans. While this property sale process would be implemented in compliance with the procedures outlined in the Affordable Sales Program (ASP) Regulations, the ASP regulations are being drafted and finalized as part of a separate regulatory process, with a separate public input process. The final EIR will comply with the final ASP regulations.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-7-9

Please see response to comment A-7-8

A-7-10

This comment request the definition of "Fostering." As used in the context of the sentence, "fostering" means to promote the growth or development of : encourage. "Foster." *Merriam-Webster.com*. Merriam-Webster, n.d. Web. 3 Nov. 2015.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-7-11

The issue raised by the commenter addresses the merits of the project and request for definitions which does not raise any issues with the environmental analysis provided in the environmental document. No further response is necessary.

A-7-12

Project Area Limits (PAL) was defined in Section 4.3.2 Existing Conditions in the first paragraph. Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-7-13

Per CEQA guideline §15140, EIRs should be written in plain language so that decision-makers and the public can easily understand the documents. The language in Table S-1 is written in plain language. The comment request definitions to the words "increase", "avoid," "minimized" or "currently readily available" which addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. No further response is necessary.

A-7-14

The issue raised by the commenter addresses the merits of the project and request for definitions which does not raise any issues with the environmental analysis provided in the environmental document. No further response is necessary.

A-7-15

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties.

The potentially 148 households displaced would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

A-7-16

The sentence has been revised to read, "The ASP regulations...". Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. The DEIR will not be removed or recirculated.

A-7-17

Please see response to comment A-7-15

A-7-18

Please see response to comment A-7-8

A-7-19

Government Code Section 54237.7 allocates the proceeds of sales made by the Department for the purposes of providing repairs to properties sold at an affordable price, pursuant to Section 54237(b), and for certain transportation-related projects in the geographic area described as "Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and that portion of Los Angeles within the 90032 ZIP Code." That description defines the geographical limits on the use of sale proceeds that can be used for affordable housing for the purpose of environmental mitigation.

A-7-20

The proposed regulations are in full compliance with the provisions of the APA, in that they adhere to the requirements regarding authority, reference, clarity, consistency, necessity, and non-duplication. The regulations were drafted to remain within the scope of the statutory authority and to be consistent with and non-duplicative of existing law.

A-7-21

Please see response to comment A-7-8 and A-7-20

A-7-22

Please see response to comment A-7-20

A-7-23

Government Code section 54237 sets forth the priorities for sales. A change would require legislation. The proposed regulation section 1476(p) provides a definition of good standing.

A-7-24

The proposed regulation section 1476(b) provides the definition of affordable price and section 1476(l) provide the definition for fair market value.

A-7-25

Government Code Section 54236(h) dictates that the Department use median income as published by the United States Department of Housing and Urban Development (HUD) as implemented by Health and Safety Code Section 50093.

A-7-26

The proposed regulation section 1477(a)(4) provides the factors considered for feasibility and section 1476(bb) provides the definition for reasonable price.

A-7-27

The Department is unable to ascertain the meaning of this comment and therefore no response is provided. The proposed regulation section 1477(a)(5)(b) includes the requested provision.

A-7-28

Government Code section 54237(b) and (d) set forth provisions that the selling price shall not be less than the price paid by the agency for original acquisition.

A-7-29

Please see response to comment A-7-8

A-7-30

The action was evaluated consistent with the requirements of CEQA in Section 1.3, 'Overview of Proposed Action,' of the environmental document. As described in the last paragraph of Section 1.1.1, 'Action Background,' the references to SB 416, Roberti Bill, and ASP are listed.

A-7-31

Per Public Resource Code § 21067. Caltrans is lead agency. "Lead agency" means the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment. The California Transportation Commission is a responsible agency Per Public Resource Code § 21069. "Responsible agency" means a public agency, other than the lead agency, which has responsibility for carrying out or approving a project.

A-7-32

Government Code Section 54237.7 allocates the proceeds of sales made by the Department for the purposes of providing repairs to properties sold at an affordable price, pursuant to Section 54237(b), and for certain transportation-related projects in the geographic area described as "Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and that portion of Los Angeles within the 90032 ZIP Code." That description defines the geographical limits on the use of sale proceeds that can be used for affordable housing for the purpose of environmental mitigation.

A-7-33

Please see response to comment A-7-32

A-7-34

Per Caltrans Standard Environmental Reference, all higher environmental documents; such as, this EIR shall include a list of technical studies in the appendices.

A-7-35

Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. For those who are relocating and are eligible, Government Code Section 54238.3(b) sets forth the relocation benefits and advisory assistance to be offered. Caltrans is currently exploring several options to engage outside assistance in the disposal and financing of the properties.

A-7-36

Please see response to comment A-7-8

A-7-37

Streets and Highways Code section 118.6 states, "The department shall, to the greatest extent possible, offer to sell or exchange excess real property within one year from the date that it is determined by the department to be excess." It is unclear what the commenter is requesting. The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. No further response is necessary

A-7-38

Per CEQA guideline §15140, EIRs should be written in plain language so that decision-makers and the public can easily understand the documents. The comment request definitions to the words "intent", and "expanding" which addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. No further response is necessary.

With regard for the comment about vacant properties, unimproved leased property not sold to current tenants, and vacant unimproved property, will be offered for sale pursuant to Streets and Highways Code Section 118.6 which allows properties to be offered at auction to the public, or by sale or exchange to public agencies. A change would require legislation.

A-7-39

Please see response to comment A-7-8

A-7-40

The title in Appendix F has been revised to Affordable Sales Program Regulations

A-7-41

Please see response to comment A-7-8

A-7-42

Please see response to comment A-7-8. With regard to the comment about the SR-710 North Study Maps, maps of the proposed alternatives can be found at http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/ under Project Alternative Maps.

A-7-43

Please see response to comment A-7-8

A-7-44

Please see response to comment A-7-8

A-7-45

Caltrans is committed to selling the properties as soon as possible but an exact timeline is undeterminable at this time. The regulations are in full compliance with the provisions of the APA, in that they adhere to the requirements regarding authority, reference, clarity, consistency, necessity, and non-duplication. Specifically, the regulations were drafted to remain within the scope of the statutory authority and to be consistent with and non-duplicative of existing law. Including other provisions in the regulations would require a statutory change.

With regard for the comment about vacant properties, unimproved leased property not sold to current tenants, and vacant unimproved property, will be offered for sale pursuant to Streets and Highways Code Section 118.6 which allows properties to be offered at auction to the public, or by sale or exchange to public agencies. A change would require legislation.

A-7-46

Please see response to A-7-8.

The regulations are in full compliance with the provisions of the APA, in that they adhere to the requirements regarding authority, reference, clarity, consistency, necessity, and non-duplication. Specifically, the regulations were drafted to remain within the scope of the statutory authority and to be consistent with and non-duplicative of existing law.

A-7-47

Caltrans extended the ASP public comment period to 55 days, ending on August 24, 2015 to provide public comment on non-substantial and sufficiently-related changes on the regulations and SRIA. The regulations are in full compliance with the provisions of the APA, in that they adhere to the requirements regarding authority, reference, clarity, consistency, necessity, and non-duplication. Specifically, the regulations were drafted to remain within the scope of the statutory authority and to be consistent with and non-duplicative of existing law.

A-7-48

Please see response to A-7-46

A-7-49

Unimproved leased property not sold to current tenants, and vacant unimproved property, will be offered for sale pursuant to Streets and Highways Code section 118.6 which allows properties to be offered at auction to the public, or by sale or exchange to public agencies. A change would require legislation.

With regard to the comment about the approximately 148 households, please see response to A-7-15.

A-7-50

The regulations are in full compliance with the provisions of the APA, in that they adhere to the requirements regarding authority, reference, clarity, consistency, necessity, and non-duplication. Specifically, the regulations were drafted to remain within the scope of the statutory authority and to be consistent with and non-duplicative of existing law.

A-7-51

The regulations are in full compliance with the provisions of the APA, in that they adhere to the requirements regarding authority, reference, clarity, consistency, necessity, and non-duplication. Specifically, the regulations were drafted to remain within the scope of the statutory authority and to be consistent with and non-duplicative of existing law.

A-7-52

The regulations are in full compliance with the provisions of the APA, in that they adhere to the requirements regarding authority, reference, clarity, consistency, necessity, and non-duplication. Specifically, the regulations were drafted to remain within the scope of the statutory authority and to be consistent with and non-duplicative of existing law.

A-7-53

The proposed regulation section 1486 references to Streets and Highways Code section 118 which further references the California Transportation Commission (CTC). The proposed regulation section 1476(dd) provides that transfer includes sales, assignment, or conveyance of any interest in the property.

A-7-54

The proposed regulations are in full compliance with the provisions of the APA, in that they adhere to the requirements regarding authority, reference, clarity, consistency, necessity, and non-duplication. Specifically, the regulations were drafted to remain within the scope of the statutory authority and to be consistent with and non-duplicative of existing law.

A-7-55

Please see response to comment A-7-54

A-7-56

Please see response to comment A-7-54

Kendis Heffley / Westridge School

A-8

Please see uploaded Comment Letter



**WESTRIDGE
SCHOOL**

324 Madeline Drive
Pasadena, California
91105-3399

t 626.799-1153
f 626.799-9236

www.westridge.org

September 8, 2015

Allison Morrow,
Senior Environmental Planner
Division of Environmental Planning
California Department of Transportation
100 South Main Street, MS 16A
Los Angeles, California 90012

Re: SR-710 Surplus Property Sales Draft Environmental Impact
Statement

Dear Ms. Morrow:

We write on behalf of Westridge School for Girls ("School"), located at 324 Madeline Drive in the City of Pasadena, in regard to the SR-710 Surplus Property Sales Draft Environmental Impact Statement ("Draft Surplus Property Sales EIR").

We have already commented on the prior State Route 710 North Study Draft Environmental Impact Report/Environmental Impact Statement (The draft EIR will be referred to as the "Draft SR-710 Extension EIR" and the project will be referred to as the "SR-710 Extension"). On August 2, 2015, the law firm of Chatten-Brown & Carstens submitted a comment letter on behalf of the School regarding our concerns with the Draft SR-710 Extension EIR. In that comment letter, among many other issues of concern, we pointed out that separation of the SR-710 Extension from the contemplated sale of surplus properties by Caltrans ("Surplus Property Sales") constituted unlawful and impermissible piecemealing of what should be a single project under the California Environmental Quality Act ("CEQA"):

In the context of the potential for a TBM breakdown and the necessity for surface excavation to assist in its rescue, it is noteworthy that Caltrans is apparently selling its surface properties. Caltrans has recently released its EIR for its surface property sales. (<http://www.dot.ca.gov/dist07/resources/envdocs/docs/710sales/>.) This property sale process should be evaluated as part of the overall 710 extension project, not kept separate. CEQA does not permit project segmentation or piecemeal review of components of a project. Instead, it is necessary to analyze the sale of properties, and the potential reservation of subsurface rights for tunneling, as it will relate to tunnel alignment and the potential necessity of TBM rescue excavation.

A-8-1

The Draft Surplus Property Sales EIR further supports our view that Caltrans is piecemealing this project in violation of CEQA. The Draft Surplus Property Sales EIR explains that only surplus properties *not needed* for the SR-710 Extension Project will be sold, which means that some surplus properties *may be needed* for that project. Draft Surplus Property Sales EIR, p. S-1 (only surplus properties that are “not impacted by the project alternatives being evaluated in the SR-710 North Study Draft Environmental Impact Report/Environmental Impact Statement (DEIR/DEIS)” will be sold). This acknowledgement that some of the surplus properties may be needed for the SR-710 Extension links the two projects inextricably and the Surplus Property Sales cannot proceed until an alternative has been selected for the SR-710 Extension and plans for that alternative have been sufficiently finalized and disclosed. When two proposed projects are so closely tied together, and actions in one project will reasonably and foreseeably lead to actions in the other project, the two projects must be treated as a single, unified project for purposes of CEQA review. See, e.g., Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 C3d 376, 396; Santiago County Water District v. County of Orange (1981) 118 CA3d 818, 830.

A-8-2

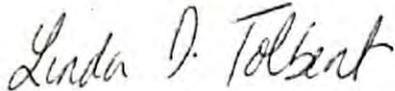
In addition, as noted in our prior comment letter, the Draft SR-710 Extension EIR was deficient in a number of respects, including the omission of critical information regarding tunnel boring machine failures and the necessary surface access to address such failures; however, the access that may be required from the surface appears to be the properties that are contemplated for sale in the Draft Surplus Property Sales EIR. Despite this, the Draft Surplus Property Sales EIR fails to address how Caltrans will reclaim properties that would be needed to rescue a trapped tunnel boring machine without undue delay, such as by retaining buy-back rights, or requiring property purchasers to waive any objections to expedited condemnation proceedings.

A-8-3

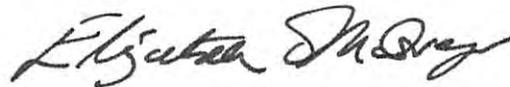
We therefore request that Caltrans address these deficiencies and the improper CEQA piecemealing by rejecting the Draft SR-710 Extension EIR and the Draft Surplus Property Sales EIR and, instead, prepare a draft EIR for a single integrated project comprised of both the SR-710 Extension and the Surplus Property Sales. The piecemeal approach being utilized by Caltrans violates CEQA and deprives our School and the public with a meaningful opportunity to understand the full impacts of the proposed project. We appreciate the opportunity to share our concerns and thank you for your consideration.

A-8-4

Sincerely,



Linda Tolbert
Chair, Board of Directors



Elizabeth J. McGregor
Head of School

A-8-1

CEQA “forbids the ‘piecemeal’ review of significant environmental impacts of a project.” The “piecemealing test” set forth by the California Supreme Court provides: “[A]n EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” Improper piecemealing may occur if the purpose of the project that is being reviewed is the first step toward future development or where the “the reviewed project legally compels or practically presumes completion of another action.” However, “two projects may properly undergo separate environmental review (i.e., no piecemealing) when the projects have different proponents, serve different purposes, or can be implemented independently.”

The SR-710 Surplus Property Sales is not a consequence of the SR-710 North Study. The SR-710 North Study and the SR-710 Surplus Property Sales have different proponents and they serve different purposes. The SR-710 North Study’s purpose 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 SR-710 Surplus Property Sales action intends to offer the surplus properties per SB 416; as stated in S.3 Description of Proposed Action in the environmental document, three state owned parcels are within the scope of the SR-710 North Study alternatives. The three parcels for the SR-710 North Study only modestly limit the SR-710 Surplus Property Sales.

A-8-2

The SR-710 Surplus Property Sales action intends to offer the surplus properties that are not impacted by the project alternatives being evaluated in the SR-710 North Study; as stated in S.3 Description of Proposed Action in the DEIR, three state owned parcels are within the scope of the SR-710 North Study alternatives. The three parcels for the SR-710 North Study only modestly limit the SR-710 Surplus Property Sales.

A-8-3

As the SR-710 Surplus Property Sales EIR’s purpose and need is to sell properties, the EIR will not evaluate the possibility of reclaiming properties due to machinery malfunction for a different project.

A-8-4

Caltrans respectfully disagrees that the SR-710 Surplus Property Sales DEIR is in violation of CEQA.

Dr. Tom Williams / Citizens Coalition for A Safe Community

A-9

All of the above...

DEIR Sales of Surplus Properties

DATE: September 08, 2015, 4:30pm

TO: Affordable Sales Program, 1120 N Street, MS 37, Sacramento, CA 95814
Contact: Kimberly Erickson,
Lauren Wonder Phone: (213) 897-9092
e-mail: Affordable_Sales_Program@dot.ca.gov
www.dot.ca.gov/dist07/business/710sales

FROM: Dr. Tom Williams, Sr. Techn. Advis., Citizens Coalition for A Safe Community
Sierra Club, Angeles Chptr., Transportation Committee

SUBJECT: SR-710 Surplus Property Sales "Draft Env. Impact Report"
RE: Comments on DEIR for Sales of Surplus Property #3
Revised Deadline: "Affordable Sales Program Public Comment Period
Extended to September 8, 2015 (5PM)"

COMMENTS (Background without bold/italics; Comments/Requests with **Bolding and Italics**)

5-24/2 Alternative 2: Action Alternative Variations A and B Community Demographics and Character ...the surplus properties would be offered to **current tenants and/or occupant given the first right of refusal**, and the sales price would be **affordable for those under a certain household income level** or at **appraised fair market value at tenant's request**. Multifamily properties would first be offered to housing-related public and private entities at a **reasonable** price, with the stipulation that current tenants be given the **first right of occupancy**. **If the proposed multifamily residence sale would result in displacements, it would be at the decision of the occupant.**

A-9-1

No definitions of the "given" or "a certain household income level" or "reasonable" or "decision of the occupant" (irrespective of the price) terms and no specific applications or criteria are provided and thereby renders any derived "actions", "effects", or "mitigation measures" totally incomplete and inadequate for assessment of impacts of the "Project" or alternatives.

Remove/revise/recirculate.

5-24/3 The **Affordable Sales Program (ASP) regulations process** is happening concurrently with this Environmental Impact Report (EIR) process and **is striving to ensure** that **those tenants who desire purchasing their homes** will be afforded **every possible opportunity** to do so, thereby **limiting the possibility of changing the community demographics and character.**

A-9-2

*Regulations process
desires and decisions
Regulations "Striving to ensure"
Tenants vs occupants
desire, and their homes and apartments or condos
Every possible opportunity
Limiting
Possibility
Remove/revise/recirculate.*

5-24/3 Additionally, higher rates of homeownership generally **positively correlate with a higher level of community cohesion, benefiting the communities and neighborhoods** in which the surplus properties are located.

A-9-3

Displacement of 148 households (equivalent of all Caltrans residents, tenants and occupants south of Huntington Drive in LA City) would foster higher income purchasers who could acquire the residences without restrictions and then lease them out as they wish after current tenants/occupants were

displaced. Based on this statement, such actions would have a NEGATIVE correlate and would not benefit or would adverse impact the communities and neighborhood.

See also 5-23/1.

Repetition of the same pronouncement appears to indicate an unfounded belief of or instruction to the preparers.

Remove/revise/recirculate for both 5-23/1 and 5-24/3.

A-9-3

5-26/4 Because ~~neither~~ variations of Alternative 2 **are NOT** expected to result in the displacement of a **disproportionate number of low-income residents** or **NOT** result in **significant, unavoidable impacts on low-income (or non-low-income) populations**, it is **reasonable to conclude** that ~~neither~~ variationS of Alternative 2 would **NOT** result in adverse impacts that are **appreciably more severe or greater in magnitude on environmental justice populations than the adverse effects experienced by non-environmental justice populations**.

Lack of clarity regarding negative statements appear purposeful and attempts to sway the reviewers towards and specific acceptance of the displacements and their impacts.

Remove/revise/recirculate.

A-9-4

5-26/5 Reasonably Foreseeable Actions **Reasonably** foreseeable actions would occur in the areas that are planned for development or redevelopment. These **reasonably** foreseeable actions are listed...and shown....

Use of reasonable/reasonably appears to be attempts to sway the reviewers of some process of reason and evidence were used in the development of the "Actions" and the "Regulatory Process" of the Project, although evidence and statements do not provide such, e.g., the process by which the preparers arrive at the displacement of 148 households from a five-mile corridor.

Remove/revise/recirculate.

A-9-5

4-81/1 The **ASP regulations** implementing the statute and governing the sale of the properties **are being drafted to ensure that every opportunity** will be afforded to low- and moderate-income households to purchase their homes, **thereby avoiding and minimizing the relocation of these households**.

As indicated herein the ASP regulations are being drafted and therefore the "Project" has not been established so that mitigation, monitoring, an reporting can be provided and incorporated into the Final EIR.

No definitions or specifications are provided for "every opportunity" to purchase, and "avoiding and minimizing" the relocation. No differentiation between relocation and displacement is provided.

The 148 households have been estimated without description and quantification as to how relocation/displacement will be avoided or minimized which must be subject of recommended mitigation for adverse effects.

Remove/revise/recirculate.

A-9-6

4-71/3 Also, it is further **assumed** that, of the occupied residential properties not purchased by housing-related entities (all single-family residences), approximately 100 will be sold at affordable prices to current occupants. The **remaining 148 single-family properties** will be sold at fair market value to non-occupants, thus **resulting in 148 anticipated displaced households**.

4-72/5 Variation B Options 1 and 2 There is no difference in the number of displacements from residential surplus properties under Variation B Options 1 and 2. However, all of the sales and subsequent displacements would occur in a single year under Variation B Options 1 and 2. This would make it more difficult to find suitable single-family residential or multifamily residential replacement housing. Similar to Variation A, **all 148 households would be displaced from single-family residential units**.

4-73/1 148 residential units would be required to accommodate the displacement of these **148 households**.

The estimated 148 households are not described or located with regard to the preferred Study alternative or any alternative physical project. No description or methods of the "assumed" sale at "fair market value" and how the process arrived at 148 households. No provisions are stated as to how the other purchases were estimated or "assumed".

A thorough quantified and documented method for this assumption must be provided, preferably in tabulator form.

Remove/revise/recirculate.

A-9-7

5-24/4 Relocation and Real Property Impacts...all potential **displacements** associated with this action,.... There are **special relocation problems** associated with this action.

Although recognized they have not been itemized and related to the displacements or relocation. No listing of the "special relocation problems" is provided.

Remove/revise/recirculate.

A-9-8

DRIR 2015

p.2/3

C. General Description of Properties:

In the northern State Route 710 project area, Caltrans currently holds title to 460 properties originally acquired for the SR-710 extension project. They include single-family residential properties, multi-family properties (ranging from duplexes to small apartment buildings), and commercial/industrial and unimproved properties. Of these properties, there are approximately 312 occupied single-family residences, 45 vacant single-family residences, and 41 occupied multi-family units. The remaining properties consist of unoccupied residential, commercial/industrial, vacant land, and special use properties.

What is difference between vacant and unoccupied single family residences and residential properties??

A-9-9

A-9-1

Government Code Section 54237 sets forth the priorities for sales. A change would require legislation.

A-9-2

It is unclear what the commenter is requesting. The issue raised by the commenter addresses the merits of the project and does not raise any issues with the environmental analysis provided in the DEIR. No further response is necessary.

A-9-3

Government Code Section 54237 sets forth the priorities for sales. A change would require legislation. The Roberti law, upon which the Affordable Sales Program is based, provides for the sale of property at affordable prices to low or moderate income tenants.

A-9-4

Per CEQA guideline §15140, EIRs should be written in plain language so that decision-makers and the public can easily understand the documents. The language in the DEIR is written plain language.

A-9-5

The issue raised by the commenter addresses the merits of the project and request for definitions which does not raise any issues with the environmental analysis provided in the DEIR. No further response is necessary.

A-9-6

The action being analyzed in the SR-710 Surplus Property Sales DEIR involves the sale of the surplus properties originally acquired by Caltrans. While this property sale process would be implemented in compliance with the procedures outlined in the Affordable Sales Program (ASP) Regulations, the ASP regulations are being drafted and finalized as part of a separate regulatory process, with a separate public input process. The final EIR will comply with the final ASP regulations.

A-9-7

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. Furthermore, Caltrans will not disclose the names of the current tenants and/or current occupants in the 710 properties.

As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value

(FMV). Per the 2012 audit: $398-100-41-45=212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow= 64 homes. Therefore, $212-64=148$ properties/households will have their initial sale at FMV.

A-9-8

The action's impacts were evaluated consistent with the requirements of CEQA in Section 5.2.4.3, 'Community Factors,' of the environmental document. As described therein, the project would not result in any significant impacts under project or cumulative conditions (see page 5.20-27). The commenter does not offer any evidence on how the project would result in significant relocation impacts; therefore, no further response can be provided.

A-9-9

The issue raised by the commenter addresses the merits of the project and request for definitions which does not raise any issues with the environmental analysis provided in the DEIR. No further response is necessary.



September 8, 2015

Mr. Ron Kosinski
Caltrans District 7, Division of Environmental Planning
100 South Main Street, MS-16A
Los Angeles, CA 90012

Transmitted via email

Re: Comments on SR-710 Surplus Property Sales Draft Environmental Impact Report (DEIR)

Dear Mr. Kosinski,

The National Trust for Historic Preservation appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) prepared by the California Department of Transportation (Caltrans) to implement a Surplus Property Sales program to dispose of 460 properties that have been held by Caltrans in Pasadena, South Pasadena, and Los Angeles for many decades. It is encouraging to see that this action is intended to finally relieve Caltrans of the role of property manager and to provide hundred of units of badly-needed affordable housing. The sale of these properties provides an important opportunity to bring renewed stability and vitality to the residential neighborhoods within the 710 corridor after so many years of uncertainty.

We adopt and endorse the comments of our colleagues at the Los Angeles Conservancy, the City of South Pasadena, and Pasadena Heritage, and we offer the following additional comments on the Surplus Property Sales Draft EIR:

- **Decision-Making Relies on Flawed and Incomplete Section 106 Documentation for the SR-710 North Study.**

Section 4.3.4 of the Draft EIR states “the potential for the SR-710 Surplus Property Sales alternatives to affect cultural resources is based on the preliminary Finding of No Adverse Effect for the SR-710 Surplus Property Sales.” DEIR at 4-111. As part of our August 4, 2015, comments on the SR-710 North Study DEIR/DEIS, the National Trust also provided extensive comments specifically on the preliminary Finding Of No Adverse Effect (FONAE), which highlighted numerous inconsistencies and errors throughout that crucial document. Many other commenters also raised objections to the proposed FONAE, which calls into question its assumptions. The California State Historic Preservation Office (SHPO) has not concurred with the Finding of No Adverse Effect, and even Caltrans itself has not yet been willing to sign the FONAE. As a result, the FONAE simply cannot be relied upon as the basis for assumptions about impacts in the Draft EIR for the Surplus Property Sales. The FONAE should be considered inadequate on its face, and we expect that it will be substantially revised in the future.

A-10-1

Modifications to the FONAE, especially a finding of adverse effects by the SHPO, has the potential to influence the mitigation required for several of the parcels. Any decisions that directly affect the identification and classification of parcels and are reliant on the Finding of Effect are not appropriate at this time and should not occur until after the SHPO and all other consulting parties have provided concurrence on the FOE and Caltrans has signed the document.

A-10-2

- **Determinations are Dependent on Future Selection of SR-710 North Study Alternatives.**

The 460 properties will be identified, declared “excess,” and processed for disposition in three phases, “[o]nce the properties are identified as being no longer necessary for the project alternatives in the SR-710 North Study.” DEIR at S-2. The Surplus Property DEIR proposes two Variations (A and B), which differ only in their timeline for the sales. Each variation has two options (1 and 2), which define different timeframes for the acquisition of easements for subsurface rights. All Variations and Options presume that the Freeway Tunnel Alternative will be selected as the preferred alternative. This approach is problematic for many reasons:

A-10-3

- Over 2500 comments were received for the SR-710 North DEIR/DEIS. It could be many months before a preferred alternative is selected. Legal action could further delay the selection of an alternative.
- Option 1 for both Variations presumes the properties will be sold over a 5-year period, with Caltrans obtaining all subsurface rights for the tunnel easement prior to the sale. The DEIR does not consider the potential negative impacts of obtaining the subsurface easements for the tunnel alternative prior to sale, which could include but are not limited to:
 - significantly diminishing the property value for new owners;
 - rendering the properties undesirable for purchase by private owners due to the uncertainty about potential negative effects such as excavation-induced ground settlement; and
 - making it difficult, excessively expensive, or impossible for new owners to obtain homeowners’ insurance due to the potential for damage from excavation-induced ground settlement.
- Option 2 for both Variations would convey all subsurface rights with the properties at the time of sale, with Caltrans acquiring all necessary subsurface easements if the Tunnel Alternative is selected as the preferred alternative. While this approach would be more expeditious in terms of returning the properties to private ownership before a preferred alternative for the SR-710 North Study is selected, it still would raise many of the same issues for new property owners outlined above. Prospective buyers, lending institutions, and insurers would face a high degree of uncertainty because they would not know at the time of sale whether the tunnel

alternative might proceed and the degree of damage it might inflict on the overlying property.

A-10-3

- **Descriptions of Preservation Covenants and other Protective Measures are Vague.**

According to the DEIR, historic properties will be subject to preservation covenants or other measures to protect the historic character and features of the properties. DEIR at 5-29. Preservation covenants are not the only option for providing adequate protection for a large number of historic properties, but they have the advantages of being held in perpetuity by qualified organizations, and they have greater flexibility because they can be adapted to address the specific character and features of each resource. As an organization that holds, monitors, and enforces easements and covenants on over 120 historic structures and landscapes across the country, the National Trust is quite concerned that the DEIR fails to clarify:

A-10-4

- how preservation covenants would function for the historic surplus properties;
- what minimum restrictions the covenants would impose;
- which organizations or entities would be considered qualified to hold and enforce these legal instruments; and
- the compensation structure for covenant holders who will monitor and enforce the covenants in perpetuity. The “one time monetary payment” and “stewardship fee” should be clarified.

To help potential covenant holding entities better understand the nature of the properties that might be candidates for covenants and the potential costs associated with holding those covenants, Caltrans should provide more details on the historic properties including but not limited to detailed descriptions of their character-defining features and their current interior and exterior conditions.

It is distressing to see that the DEIR also states, “if no buyer has been identified for a historic property due to the presence of a protective covenant associated with the property, Caltrans will remove the covenant in order to successfully sell the property.” DEIR at 5-30. The DEIR acknowledges in Table S.1 that the decision to remove a preservation covenant simply in order to facilitate a sale “may cause an adverse effect ... which in turn may result in a significant impact.” DEIR at S-6. Removing the protections to facilitate a disposition is in conflict with Caltrans’ responsibilities and the mitigation measures described in the CEQA Guidelines.

A-10-5

The Advisory Council for Historic Preservation is finalizing agency guidance and best practices on the use of covenants. We strongly recommend Caltrans contact the Council staff for a copy of their draft document and so that they can use that guidance on this undertaking.

A-10-6

Thank you for considering the comments of the National Trust for Historic Preservation on this important matter.

Sincerely,



Elizabeth Merritt
Deputy General Counsel



Christina Morris
Field Director, Los Angeles

Cc: Sue Mossman and Jesse Lattig, Pasadena Heritage
Sarah Gavit, West Pasadena Residents Association
Margaret Lin, City of South Pasadena
Linda Dishman and Adrian Scott Fine, LA Conservancy
Claire Bogaard, No 710 Action Committee

A-10-1

The SR-710 Surplus Property Sales is not relying on the Federal Section 106 documentation for the SR-710 North Study. As discussed in Section 4.3 Cultural Resources, in the environmental document, Caltrans non-historic properties were documented and received concurrence from the State Historic Preservation Officer (SHPO) on their determination of eligibility within the last 5 years, therefore Caltrans did not require new determinations of eligibility. Caltrans has already received consensus from the SHPO about the determination of eligibility of the 113 historical resources. Further, Caltrans has received concurrence on a Finding of No Adverse Effect (FONAE) from the SHPO on July 28, 2016 which can be found in Appendix J of the environmental document.

A-10-2

Please refer to response to comment A-10-1

A-10-3

The SR-710 Surplus Property Sales action intends to offer the surplus properties that are not impacted by the project alternatives being evaluated in the SR-710 North Study; as stated in S.3 Description of Proposed Action in the environmental document, three state owned parcels are within the scope of the SR-710 North Study alternatives. The three parcels for the SR-710 North Study only modestly limit the SR-710 Surplus Property Sales.

A-10-4

This comment request clarification on how the historic covenant will function and what restrictions the covenants will impose. Please refer to Section 4.2.4.2 Alternative 2—Action Alternative of the environmental where it states that properties sold with historic covenants and/or agreements will provide protection of each property's character defining features.

With regard to the comment requesting more detail about the historical resources. Detailed information about the historic property Character Defining Features can be found in the two Historic Resources Compliance Reports that have been prepared for the SR-710 Property Sales environmental document and will be readily available upon request.

A-10-5

The language that Caltrans will remove the covenant in order to successfully sell the property has been eradicated. The covenants will now be attached to the deed of the historical resource/house.

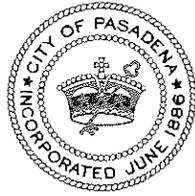
A-10-6

Caltrans acknowledges the request to contact The Advisory Council for Historic Preservation for a draft document to use as guidance on the use of covenants.

James Wong

A-11

City of Pasadena comments are contained in our letter (uploaded file).



HOUSING & CAREER SERVICES DEPARTMENT

September 8, 2015

Ron Kosinski, Deputy District Director
Caltrans District 7, Division of Environmental Planning
100 South Main Street, MS-16A
Los Angeles, CA 90012

RE: Draft Environmental Impact Report: Caltrans SR-710 Surplus Properties Sales

Dear Mr. Kosinski:

In response to the California Department of Transportation (Caltrans) Notice of Public Hearings and Availability of Environmental Impact Report (EIR) dated July 7, 2015 regarding the SR-710 Surplus Properties Sales, and the Caltrans Notice of Extension of Public Comment Period of EIR dated August 17, 2015, the City of Pasadena ("City") hereby submits the following comments:

Comment #1: A stated purpose of the proposed Caltrans action, in section S.2 of the Draft EIR, is to "provide needed affordable housing in the subject area." The City strongly concurs with this purpose and, accordingly, urges that the proposed Affordable Sales Program Regulations (Regulations), in Appendix F of the Draft EIR, be modified to further facilitate the creation of affordable housing in Pasadena. Specifically, the City recommends amending the Regulations in the following manner:

A-11-1

- §1477(a)(4)(iii): Priority should be given to the "designated housing-related public entity" (as defined in (ii)).
- §1476(bb): The definition of "Reasonable Price", as it pertains to the sale of surplus property to a designated housing-related public entity or private nonprofit entity, should be modified with the inclusion of the following provisions:
 - a) For unimproved property: The residual amount based on the affordable price calculated at the moderate income level, less the cost of developing dwelling units on the property. The residual amount will be determined jointly by Caltrans and the housing-related entity
 - b) For improved property: The residual amount based on the affordable price calculated per at the moderate income level, less the cost of repairing and rehabilitating the existing improvements to bring them to habitable and marketable standards. The residual amount will be determined jointly by Caltrans and the housing-related entity.

Mr. Ron Kosinski
September 8, 2015
Page 2

Comment #2: Chapter 7.2.2 (page 248) of the Draft EIR states that “on July 9, 2014, Caltrans sent a letter to the City of Pasadena offering the sale of six (6) vacant parcels” and that “The City of Pasadena accepted the offer and is currently in the appraisal phase of this process.” We wish to clarify that on May 27, 2015 and July 20, 2015 the City provided written notification to Caltrans of our decision to decline the offer for the reasons stated in the letters (economics, development potential). The declined properties consist of: 245 Waverly Drive, 255 Waverly Drive, 375 Havendale Drive, 405 Havendale Drive, and 250 W. Bellevue Drive.

A-11-2

Comment #3: Chapter 4.3 of the Draft EIR states that of the total 460 Caltrans-owned properties in the Project Area Limits, 113 properties are historical resources of which with 75 are located in Pasadena. As a proposed measure to avoid and/or minimize impacts related to cultural resources, “Agreements to protect historical resources will be enforceable by way of third-party monitoring by a non-profit organization”, and that Caltrans “will provide a one-time monetary payment, a stewardship fee, to ensure that the qualified organization will have the financial support for the continued monitoring of the historic covenants or other protective measures as agreed”. The City is in general support of this measure and requests that the City be consulted in the criteria and process utilized by Caltrans to identify and select the non-profit monitoring organization.

A-11-3

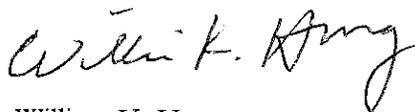
Comment #4: The City reaffirms the position stated in our letter to your office dated July 17, 2014 from then-Mayor Bill Bogaard (which letter is included in Appendix I (page 361) of the Draft EIR) regarding “the City’s expectation about certain improvements that are needed to return the Pasadena Avenue/Saint John Avenue area to its former condition which was compatible with the surrounding neighborhood areas”.

A-11-4

We appreciate this opportunity to comment on the Draft EIR and look forward to working with Caltrans to preserve, upgrade and expand the supply of affordable housing within Pasadena.

If you have any questions or comments please feel free to contact Jim Wong, Senior Project Manager, at jwong@cityofpasadena.net or (626) 744-8320.

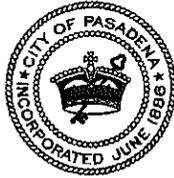
Sincerely,



William K. Huang
Director of Housing and Career Services

w/ encl

cc: Michael J. Beck
Julie Gutierrez
Steve Mermell
Jim Wong



OFFICE OF THE MAYOR

July 17, 2014

Ron Kosinski *RK*
Caltrans District 7, Division of Environmental Planning
100 S. Main St., Ste. 100
Los Angeles, CA 90012-3606

Dear Mr. Kosinski:

This relates to the notice of preparation for a Draft Environmental Impact Report for the 710 surplus property sale project (File: 07-LA710). We understand the purpose of the NOP includes soliciting input regarding the scope and content of the analysis in the Draft EIR and to identify potential environmental impacts that the Draft will evaluate.

I am writing to affirm a position that has been conveyed in the past regarding the City's expectation about certain improvements that are needed to return the Pasadena Avenue/Saint John Avenue area to its former condition which was compatible with the surrounding neighborhood areas.

In the mid-1970's, Caltrans initiated a supposedly temporary traffic plan along Saint John and Pasadena Avenues which is often referred to as the "wishbone". At that time, to accommodate the perceived needs of the temporary traffic plan, the intersection of Pasadena Avenue at Bellefontaine Street was split into two, concrete sidewalks were removed, parkways and their mature camphor trees were demolished, streets were redesigned as one-way streets, and the intersecting streets of Congress Place, Markham Place and Wigmore Drive were barricaded.

Now, 35 years later, the City expects and requests that these streets will be returned to their original two-way traffic. We look to Caltrans, as it proceeds with the sale of the 710 surplus property, to work with our Department of Public Works to finalize a scope of work that includes roadway resurfacing, sidewalks, street lights, curbs and gutters, planting of designated street trees and other infrastructure improvements, and restoration of the original pattern of streets and blocks at the wishbone which will make the neighborhood "whole" again.

We appreciate this opportunity to offer these comments regarding the expectations of our community and stand ready to respond fully in the event there are questions or other ways in which we might be helpful to you in this important effort. Thank you very much.

Sincerely,

BILL BOGAARD
Mayor

BB:jls

A-11-1

Government Code section 54237 sets forth the priorities for sales. A change would require legislation. The regulation section 1477(a)(4) provides the factors considered for feasibility and section 1476(bb) provides the definition for reasonable price.

A-11-2

Section 7.2.2., 'City of Pasadena Consultation' has been updated to reflect the information provided in the comment.

A-11-3

The commenter's support for the stewardship fee and historical covenant has been acknowledged. This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

A-11-4

Caltrans will consider returning the Pasadena Avenue/ Saint John Avenue to its former conditions in future transportation projects.



CITY OF SOUTH PASADENA

OFFICE OF THE CITY MANAGER
1414 MISSION, SOUTH PASADENA, CA 91030
TEL: 626.403.7210 • FAX: 626.403.7211
WWW.SOUTHPASADENACA.GOV

August 31, 2015

Ron Kosinski
Deputy District Director
Caltrans District 7, Division of Environmental Planning
100 South Main Street, MS-16A
Los Angeles, CA 90012

RE: SR-710 Surplus Property Sales Draft EIR, SCH# 2014071006

Dear Mr. Kosinski:

The City of South Pasadena (City) appreciates the opportunity to review and comment on the State Route 710 (SR-710) Surplus Property Sale Draft Environmental Impact Report (EIR). The City provides the following comments, and requests that Caltrans respond to each comment in this letter:

- Please confirm that the 562 properties listed in Table 1.2 includes all Caltrans owned properties in the City, if the table does not include all Caltrans owned properties in the City, please provide a comprehensive list of said properties.
 - Please identify the 460 parcels "Caltrans is mandated to sell".
 - Please clarify when the remaining 102 properties will be sold.
 - Please clarify why there are only "7 vacant surplus properties and 73 residential surplus properties in the City of South Pasadena" identified in Table 4.3, when Table 1.2 indicates that there are 110 properties in the City of South Pasadena.
 - Please identify which of the 80 properties in the City were included in Table 4.3.
- Priorities in which a prospective buyer can make an offer - the City requests that the order of priority be revised as follows and as outlined in the City's comment letter regarding the revised Affordable Sales Program regulations (*please see Attachment 1*):

A-12-1

<u>Caltrans' Revised Regulations</u> (July 1, 2015)	<u>City's Proposed Revisions</u>
1. All single-family residences presently occupied by their former owners shall be offered to those former owners at the Department approved appraised fair market value on condition they are tenants in good standing.	No changes.
2. All single-family residences shall be offered at an affordable price or	2. All single-family residences shall be offered at an affordable price or Department approved

A-12-2



**Caltrans' Revised Regulations
(July 1, 2015)**

City's Proposed Revisions

Department approved appraised fair market value at each prospective buyer's option to the occupants, on condition occupants are:

- (i) Tenants in good standing
- (ii) Have occupied the surplus residential property as their principal place of residences two years or more
- (iii) Are persons or families of low or moderate income
- (iv) Have not had an ownership interest in real property in the last three years

appraised fair market value at each prospective buyer's option to the occupants, on condition occupants are:

- (i) Tenants in good standing
- (ii) Have occupied the surplus residential property as their principal place of residences two years or more
- (iii) Are persons or families of low or moderate income

(remove the language in paragraph (iv) regarding ownership interest in real property in the last three years)

3. All single-family residences shall be offered at an affordable price or Department approved appraised fair market value at each prospective buyer's option to the occupants, on condition occupants are:

- (i) Tenants in good standing
- (ii) Have occupied the surplus residential property as their principal place of residence five years or more
- (iii) Have household gross income that is above ~~low or~~ moderate income but does not exceed 150 percent of the area median income adjusted for family size
- (iv) Have not had an ownership interest in real property in the last three years

3. All single-family residences shall be offered at an affordable price or Department approved appraised fair market value at each prospective buyer's option to the occupants, on condition occupants are:

- (i) Tenants in good standing
- (ii) Have occupied the surplus residential property as their principal place of residence five years or more
- (iii) Have household gross income that is above low or moderate income but does not exceed 150 percent of the area median income adjusted for family size

(remove the language in paragraph (iv) regarding ownership interest in real property in the last three years)

4. All other surplus residential properties and all properties described in paragraphs 1, 2, or 3 of this subparagraph (a) That are not purchased by the former owners or occupants, shall then be offered at a reasonable price to and in the following order of priority:

- (i) If it is feasible, then the surplus residential property shall be offered to prospective housing-related private and public entities on condition that the purchasing entity cause the surplus property to be rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives, with first right of occupancy to current tenants
- (ii) If it is not feasible to sell the surplus residential property to prospective

5. All other surplus residential properties and all properties described in paragraphs 1 to 4 of this subparagraph that are not purchased by the former owners or occupants, shall then be offered at a reasonable price to prospective housing-related public entities on condition that the purchasing entity cause the surplus property to be rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives, with first right of occupancy and potential ownership to the current tenants

- a. If it is not feasible to sell the surplus residential property to prospective housing-related public entities with the above condition, the surplus residential property shall then be offered to a housing-related private entity on condition that the purchasing entity cause the surplus property to be

A-12-2

**Caltrans' Revised Regulations
(July 1, 2015)**

City's Proposed Revisions

<p>(iii) housing-related private or public entities on condition that the purchasing entity cause the surplus residential property to be rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives, then the surplus residential property shall be offered to a housing-related public entity as designated by the legislative body of the city in which the surplus residential property is located</p> <p>To any housing-related private or public entity on condition the purchasing entity shall cause the surplus residential property to be used for low and moderate income rental or owner-occupied housing</p>	<p>rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives, with first right of occupancy and potential ownership to current tenants</p> <p>b. If it is not feasible to sell the surplus residential property to be rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives, then the surplus residential property shall be offered to a housing-related public entity as designated by the legislative body of the city in which the surplus residential property is located</p> <p>(i) To a housing-related public entity on condition the purchasing entity shall cause the surplus residential property to be used for low and moderate income rental or owner-occupied housing</p> <p>(ii) To a housing-related private entity on condition the purchasing entity shall cause the surplus residential property to be used for low and moderate income rental or owner-occupied housing</p> <p><i>(reorder the priority order of the Conditional Offer Prior to Sale to prioritize public housing related entities above private housing related entities)</i></p>
<p>5. Any surplus residential properties not sold pursuant to subparagraphs 1 to 4 inclusive, shall then be sold at fair market value to and in the following order of priority:</p> <p>(i) To current tenants in good standing who intend to be owner occupants</p> <p>(ii) To former tenants in good standing who intend to be owner occupants, with priority given to the most recent tenants first</p> <p>(iii) With preference given to the highest responsive bidder who will be an owner occupant</p>	<p>4. *Any surplus residential properties not sold pursuant to subparagraphs 1 to 3 inclusive, shall then be sold at fair market value to and in the following order of priority:</p> <p>a. To current tenants in good standing who intend to be owner occupants</p> <p>b. To former tenants, that were in good standing at the time they vacated the premises, who intend to be owner occupants, with priority given to the most recent tenants first</p> <p><i>(reorder the priority order of the Conditional Offer Prior to Sale to prioritize public housing related entities above private housing related entities)</i></p>

A-12-2

- Subsurface Easements - please provide clarification regarding what would happen to the subsurface easements that Caltrans retains if the Tunnel Alternative is not selected as the preferred alternative?
- Table 2.1 Number of Properties Estimated to be Sold Over 5-Year Implementation Period

A-12-3

A-12-4

- Please clarify how the 398 single-family and multi-family residences of the 562 properties to be sold were identified.
- Please clarify how the properties were distributed over the 5-year implementation period.
- Please clarify which properties will be sold during each year during the 5-year implementation period.
- Chapter 4.2.2.4 Impacts states that “Caltrans will not subdivide ownership of multifamily residential properties”.
 - Please clarify how Caltrans will ensure that the sale of these properties to housing entities will not displace the existing households of these multifamily residential properties.
- Chapter 4.2.2.4 Impacts states that “Housing entities are assumed to purchase an additional 64 single-family residences for concurrent resale to current occupants”.
 - Please identify which 64 single-family properties will be sold to housing entities and how Caltrans will ensure that the existing households will not be displaced.
 - Please provide clarification regarding the assumptions used to determine that “approximately 100 will be sold at affordable prices to current occupants. The remaining 148 single-family properties will be sold at fair market value to non-occupants, thus resulting in 148 anticipated displaced households”.
 - Please provide clarification regarding the proposed outcomes for the additional 64 occupied single-family residences that were not identified.
- Mitigation Measure R-1 - fails to provide detailed information outlining how Caltrans will minimize the number of people displaced.
 - Please provide additional information regarding the financing products and assistance that will be provided to occupants who are not able to purchase their residences.
- Chapter 4.3 Cultural Resources - The City is currently updating its Historic Resources Survey and Inventory and requests that Caltrans update their records to reflect the changes identified in the City’s updated inventory (*please see Attachment 2*).
- The City requests that Caltrans sell properties with a historic covenant whenever feasible, and that the South Pasadena Housing Authority be the custodian of said covenants on behalf of the City.

↑
A-12-4

A-12-5

A-12-6

A-12-7

A-12-8

A-12-9

We look forward to working with Caltrans to preserve, upgrade, and expand the supply of housing within the City of South Pasadena.

If you have any questions or comments please feel free to contact Margaret Lin, Principal Management Analyst, at MLin@southpasadenaca.gov or (626)403-7236.

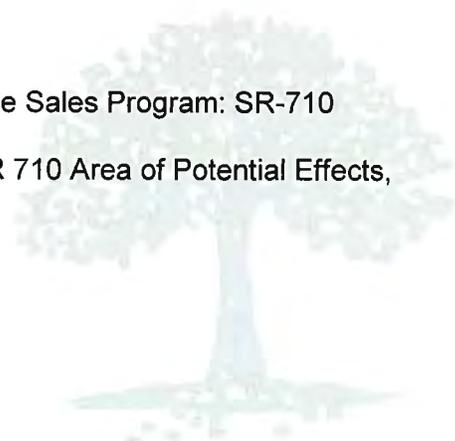
Sincerely,

Sergio Gonzalez
City Manager

Attachments:

1. City of South Pasadena’s comment letter regarding the Affordable Sales Program: SR-710 Home Sales, August 12, 2015
2. City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects, July 17, 2015

cc: South Pasadena City Council



This page intentionally left blank

ATTACHMENT 1

City of South Pasadena's comment letter regarding the
Affordable Sales Program: SR-710 Home Sales,
August 12, 2015



CITY OF SOUTH PASADENA

OFFICE OF THE CITY MANAGER
1414 MISSION, SOUTH PASADENA, CA 91030
TEL: 626.403.7210 • FAX: 626.403-7211
WWW.SOUTHPASADENACA.GOV

August 12, 2015

Andrew Nirenberg
Acting Chief, Division of Right of Way and Land Surveys
ATTN: Affordable Sales Program
California Department of Transportation
1120 N Street, MS 37
Sacramento, CA 95814

RE: Affordable Sales Program: SR-710 Home Sales

Dear Mr. Nirenberg:

The City of South Pasadena (City) appreciates the opportunity to review and comment on the revised regulations for the Affordable Sales Program. We strongly support Caltrans's goal of maximizing transportation system performance and accessibility; and dedication to effective communication, collaboration, and partnership.

The City is excited for the release of surplus properties and the opportunity to upgrade and expand the supply of housing available within our jurisdiction. While the new proposed regulations address many of the issues that were raised during the initial public comment period, the City would like to request that Caltrans amend the new proposed rules and regulations of the Affordable Sales Program as follows:

- I. Properties identified for Phase 1A are single-family residences that Caltrans has determined are non-historic and would not result in any adverse community impact.
 - 1) The City requests that Caltrans provide a thorough analysis of the properties proposed for release in Phase 1A to ensure that there are no adverse impacts on historic properties.
 - 2) After reviewing the City's June 2014 Cultural Heritage Inventory (Inventory), it was determined that 3 of the 19 properties in Phase 1A were identified in the City's Inventory. The City requests that the following properties (and any subsequent properties identified to be historic) be moved from Phase 1A to Phase 1B:
 - i. 1707 Meridian Avenue
 - ii. 1101 Pine Street
 - iii. 852 Monterey Road

- 3) The City is currently updating its Historic Resources Survey and Inventory and requests that Caltrans update their records to reflect the changes identified in the City's updated inventory (available upon request).
- 4) The City requests that Caltrans work with the local historic preservation associations in the corridor to establish covenants that would ensure the preservation of these historic resources while providing flexibility to future owners.
- 5) The City requests that the remaining surplus properties of the 54 surplus properties identified for sale in July 1995 be included in the list of available surplus properties.
- 6) The City requests that the 110 properties identified as surplus in April 1995 be included to the list of available surplus properties.
- 7) The City requests that all vacant land parcels be identified and offered for sale
- 8) The City requests that Caltrans work with the Los Angeles County Office of the Assessor to re-establish parcel identification numbers for all of the surplus properties in the SR-710 corridor

II. The City would like to ensure that the rules and regulations of the Affordable Sales Program maximize flexibility for local residents; including former- and present-owners and occupants. The overriding premise should specify that no existing tenants, regardless of the length of tenancy, be forced to vacate their premises against their will if financially qualified to purchase a property. The City requests that Caltrans revise the order of priority of the Conditional Offer Prior to Sale to prioritize current and former tenants in good standing before housing-related entities; and prioritize public housing-related entities before private housing-related entities, as shown below:

July 1, 2015, Revised Regulations	City Proposed Revisions
1. All single-family residences presently occupied by their former owners shall be offered to those former owners at the Department approved appraised fair market value on condition they are tenants in good standing.	No changes.
2. All single-family residences shall be offered at an affordable price or Department approved appraised fair market value at each prospective buyer's option to the occupants, on condition occupants are: <ol style="list-style-type: none"> (i) Tenants in good standing (ii) Have occupied the surplus residential property as their principal place of residences two years or more (iii) Are persons or families of low or moderate income (iv) Have not had an ownership interest in real property in the last three years 	2. All single-family residences shall be offered at an affordable price or Department approved appraised fair market value at each prospective buyer's option to the occupants, on condition occupants are: <ol style="list-style-type: none"> (i) Tenants in good standing (ii) Have occupied the surplus residential property as their principal place of residences two years or more (iii) Are persons or families of low or moderate income <p><i>(remove the language in paragraph (iv) regarding ownership interest in real property in the last three years)</i></p>

July 1, 2015, Revised Regulations

City Proposed Revisions

3. All single-family residences shall be offered at an affordable price or Department approved appraised fair market value at each prospective buyer's option to the occupants, on condition occupants are:
- (i) Tenants in good standing
 - (ii) Have occupied the surplus residential property as their principal place of residence five years or more
 - (iii) Have household gross income that is above ~~low or~~ moderate income but does not exceed 150 percent of the area median income adjusted for family size
 - (iv) Have not had an ownership interest in real property in the last three years

3. All single-family residences shall be offered at an affordable price or Department approved appraised fair market value at each prospective buyer's option to the occupants, on condition occupants are:
- (i) Tenants in good standing
 - (ii) Have occupied the surplus residential property as their principal place of residence five years or more
 - (iii) Have household gross income that is above low or moderate income but does not exceed 150 percent of the area median income adjusted for family size
- (remove the language in paragraph (iv) regarding ownership interest in real property in the last three years)***

4. All other surplus residential properties and all properties described in paragraphs 1, 2, or 3 of this subparagraph (a) That are not purchased by the former owners or occupants, shall then be offered at a reasonable price to and in the following order of priority:
- (i) If it is feasible, then the surplus residential property shall be offered to prospective housing-related private and public entities on condition that the purchasing entity cause the surplus property to be rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives, with first right of occupancy to current tenants
 - (ii) If it is not feasible to sell the surplus residential property to prospective housing-related private or public entities on condition that the purchasing entity cause the

5. All other surplus residential properties and all properties described in paragraphs 1 to 4 of this subparagraph that are not purchased by the former owners or occupants, shall then be offered at a reasonable price to prospective housing-related public entities on condition that the purchasing entity cause the surplus property to be rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives, with first right of occupancy and potential ownership to the current tenants
- a. If it is not feasible to sell the surplus residential property to prospective housing-related public entities with the above condition, the surplus residential property shall then be offered to a housing-related private entity on condition that the purchasing entity cause the surplus property to be rehabilitated and developed as a limited equity cooperative housing cooperative

July 1, 2015, Revised Regulations

City Proposed Revisions

(iii) surplus residential property to be rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives, then the surplus residential property shall be offered to a housing-related public entity as designated by the legislative body of the city in which the surplus residential property is located
 To any housing-related private or public entity on condition the purchasing entity shall cause the surplus residential property to be used for low and moderate income rental or owner-occupied housing

or cooperatives, with first right of occupancy and potential ownership to current tenants
 b. If it is not feasible to sell the surplus residential property to be rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives, then the surplus residential property shall be offered to a housing-related public entity as designated by the legislative body of the city in which the surplus residential property is located
 (i) To a housing-related public entity on condition the purchasing entity shall cause the surplus residential property to be used for low and moderate income rental or owner-occupied housing
 (ii) To a housing-related private entity on condition the purchasing entity shall cause the surplus residential property to be used for low and moderate income rental or owner-occupied housing

(reorder the priority order of the Conditional Offer Prior to Sale to prioritize public housing related entities above private housing related entities)

5. Any surplus residential properties not sold pursuant to subparagraphs 1 to 4 inclusive, shall then be sold at fair market value to and in the following order of priority:
 (i) To current tenants in good standing who intend to be owner occupants
 (ii) To former tenants in good standing who intend to be owner occupants, with priority given to the most recent tenants first
 (iii) With preference given to the

4. *Any surplus residential properties not sold pursuant to subparagraphs 1 to 3 inclusive, shall then be sold at fair market value to and in the following order of priority:
 a. To current tenants in good standing who intend to be owner occupants
 b. To former tenants, that were in good standing at the time they vacated the premises, who intend to be owner occupants, with priority given to the most recent tenants first

July 1, 2015, Revised Regulations	City Proposed Revisions
highest responsive bidder who will be an owner occupant	<i>(reorder the priority order of the Conditional Offer Prior to Sale to prioritize public housing related entities above private housing related entities)</i>

- III. The City would also like to request clarification on the Frequently Asked Questions on SR-710 Housing Sales
 - 1) The City requests that Caltrans provide clarification regarding the reasoning for having the “same or two different prices” as identified in question 7 “What is double escrow sale?”
- IV. The proposed regulations are specific to residential properties; the City would like clarification regarding the release of Caltrans surplus unimproved properties to local jurisdictions.
 - 1) The City requests that Caltrans establish a reasonable price for the sale of unimproved properties to local jurisdictions, and for that reasonable price to be adjusted to reflect the property taxes lost while under Caltrans ownership.
 - 2) The City requests that the release of unimproved properties be released subject to local land use regulations.
- V. The City would also like to bring to Caltrans attention that the following stakeholders were not taken into consideration in the proposed regulations: tenancies in common, co-operative ownership, and residents of duplexes, triplexes, and other multi-unit properties.
 - 1) The City requests that Caltrans provide clarification regarding the sale of duplexes, triplexes, and other multi-unit properties.

The City requests that Caltrans provide responses to each of the questions and comments identified above. We sincerely appreciate this opportunity to provide feedback on the Affordable Sales Program and look forward to working with Caltrans to preserve, upgrade, and expand the supply of housing within the City of South Pasadena.

If you have any questions or comments please feel free to contact Margaret Lin, Principal Management Analyst, at MLin@southpasadenaca.gov or (626)403-7236.

Sincerely,



Sergio Gonzalez
City Manager

cc: South Pasadena City Council



ATTACHMENT 2

**City of South Pasadena: Historic Resources Survey
Phase 1: SR 710 Area of Potential Effects,
July 17, 2015**

This page intentionally left blank



PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

July 17, 2015

HISTORIC RESOURCES GROUP

12 S. Fair Oaks Avenue, Suite 200, Pasadena, CA 91105-1915

Telephone 626 793 2400, Facsimile 626 793 2401

www.historicresourcesgroup.com

PREPARED FOR

**City of South Pasadena
Planning & Building
1414 Mission Street
South Pasadena, CA 91030**

DRAFT

PUBLIC REVIEW DRAFT

**City of South Pasadena: Historic Resources Survey
Phase 1: SR 710 Area of Potential Effects**

HISTORIC RESOURCES GROUP

TABLE OF CONTENTS

3	Introduction
8	Guidelines for Evaluation
13	Phase 1 Survey Methodology
16	Phase 1 Survey Overview
18	Survey Results: Individually Eligible Historic Resources
20	Survey Results: Historic Districts
35	Glossary of Terms

Appendices

Appendix A: California Office of Historic Preservation Historical Resource Status Codes

Appendix B: Designated Resources within the APE

Appendix C: Properties within the APE Listed in the HRI

Appendix D: Individual Resources Identified by the Phase 1 Survey

List of Figures

Figure 1: Map of the Phase 1 Survey Area

Figure 2: Map of the Designated & Identified Individual Resources

Figure 3: Map of the El Cerrito Circle Historic District

Figure 4: Map of the Gillette Crescent Historic District

Figure 5: Map of the Library Neighborhood Historic District

Figure 6: Map of the Valley View Heights Planning District

Figure 7: Map of the Buena Vista/Prospect Addition Planning District

Figure 8: Map of the North of Mission Addition Planning District

Figure 9: Map of Altos de Monterey

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

INTRODUCTION

As part of the City of South Pasadena's ongoing efforts to identify and evaluate potential historic resources, the City received a State of California Certified Local Government (CLG) grant for the period 2013-2014 to prepare an updated Citywide Historic Context Statement.¹ As a follow-up to that effort, in 2015 South Pasadena commissioned a Citywide Historic Resources Survey and Inventory of Addresses Survey Update of all properties/resources constructed through 1970. The survey project is divided into three phases:

1. Phase 1: Caltrans State Route 710 North Area of Potential Effects (APE) as identified in the Draft Environmental Impact Report;²
2. Phase 2: Survey of modern resources constructed between 1935 and 1970; and
3. Phase 3: Update the City Inventory of Addresses.

The principal goals of the 2015 historic resources survey are:

- to update the City's out-of-date surveys and the Inventory of Addresses in accordance with applicable criteria and the Multiple-Property Documentation (MPD) framework provided in the 2014 City of South Pasadena Historic Context Statement;
- to conduct surveys of all mid-century-era properties and resources in the City, in light of the themes of significance and property types identified in the Historic Context Statement;
- to carry forward documentation on a select number of outstanding mid-century-era
- historic districts and individually eligible resources; and
- to create and provide an efficient, user-friendly method for accessing and sharing survey data with the public,

¹ Historic Resources Group, *City of South Pasadena Historic Context Statement*, December 2014.

² State of California Department of Transportation and the Los Angeles County Metropolitan Transportation Authority, *Draft Environmental Impact Report/Environmental Impact Statement and Draft Section 4(f) De Minimis Findings*, Volume I and II, March 2015. LSA Associates, Inc. and California Department of Transportation, District 7, *Historical Resources Evaluation Report for the State Route 710*

North Study, December 2014 and accompanying California Department of Parks and Recreation (DPR) forms for recording historical resources.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

stakeholders, Cultural Heritage Commission (CHC), and City staff through the use of state-of-the-art survey techniques and creation of a searchable database and/or Arc-GIS data/shape files easily adapted to the City's Arc-GIS and mapping system.

This report addresses Phase 1 of the survey project, which was undertaken in May and June 2015. The project was conducted by Historic Resources Group, including Christine Lazzaretto, Principal and Robby Aranguren, Planning Associate; both of whom meet the Secretary of the Interior's qualifications for professionals in historic preservation.³ It was overseen by John Mayer, Senior Planner, City of South Pasadena, and the Cultural Heritage Commission.

Previous Surveys

The City Council commissioned the first comprehensive historic resources survey in 1991. The purpose of that survey was to develop an inventory of historic resources and to provide a foundation for their recognition in all future planning processes. The Historic

Resources Survey: Inventory of Addresses was adopted by the City Council on November 30, 1994. The Inventory of Addresses includes properties that are designated, formally determined eligible for federal, state, or local listing, or appear eligible for federal, state, or local listing. In accordance with the City's Cultural Heritage Ordinance, all properties on the Inventory are considered historic resources for the purposes of the California Environmental Quality Act (CEQA).

In 2002, the Inventory of Addresses was updated through a reconnaissance-level survey of the City (identified as the Phase I Reconnaissance Level Survey). The 2002 Phase I survey documented 69 potential historic districts and 250 individual properties on Department of Parks and Recreation primary record forms (DPR 523A). In January 2003, Phase II was initiated to complete intensive-level documentation for the multi-phase survey project. Phase II consisted of an intensive-level survey of six potential historic districts, and the documentation of 261 individual properties on Department of

³ Federal Register, Vol. 48, No. 190, pp. 44738-44739, September 29, 1983.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

Parks and Recreation building, structure, and object forms (DPR 523B).

historic districts (“Phase 1 Survey Area”) is included in Figure 1.

As of June 2014, there are approximately 2,567 properties (both individual and district contributors) listed in the Inventory of Addresses.⁴

2015 Phase I Survey Area

Phase 1 of the survey includes the approximately 325 properties falling within the APE for the Caltrans State Route 710 North Study Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS). The DEIR has defined the APE as just above the tunnel imprint, not properties lateral to that imprint that would also be affected. As part of the Programmatic Agreement for the cultural resources study, the State Historic Preservation Officer was consulted regarding the identification of the APE and the survey findings.⁵ A letter of concurrence was received from the SHPO on February 25, 2015.⁶

In addition, the Phase 1 survey looked at potential historic districts that were partially within the APE. A map illustrating the APE and the adjacent

⁴ City of South Pasadena, “Inventory of Addresses,” June 2014.

⁵ Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as it

Pertains to the Administration of the Federal-Aid Highway Program in California, January 1, 2014.

⁶ Correspondence from Carol Rowland-Nawj, State Historic Preservation Officer to Kelly Ewing Toledo, Heritage Resource Coordinator, Caltrans District 7 Division of Environmental Planning, February 25, 2015.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

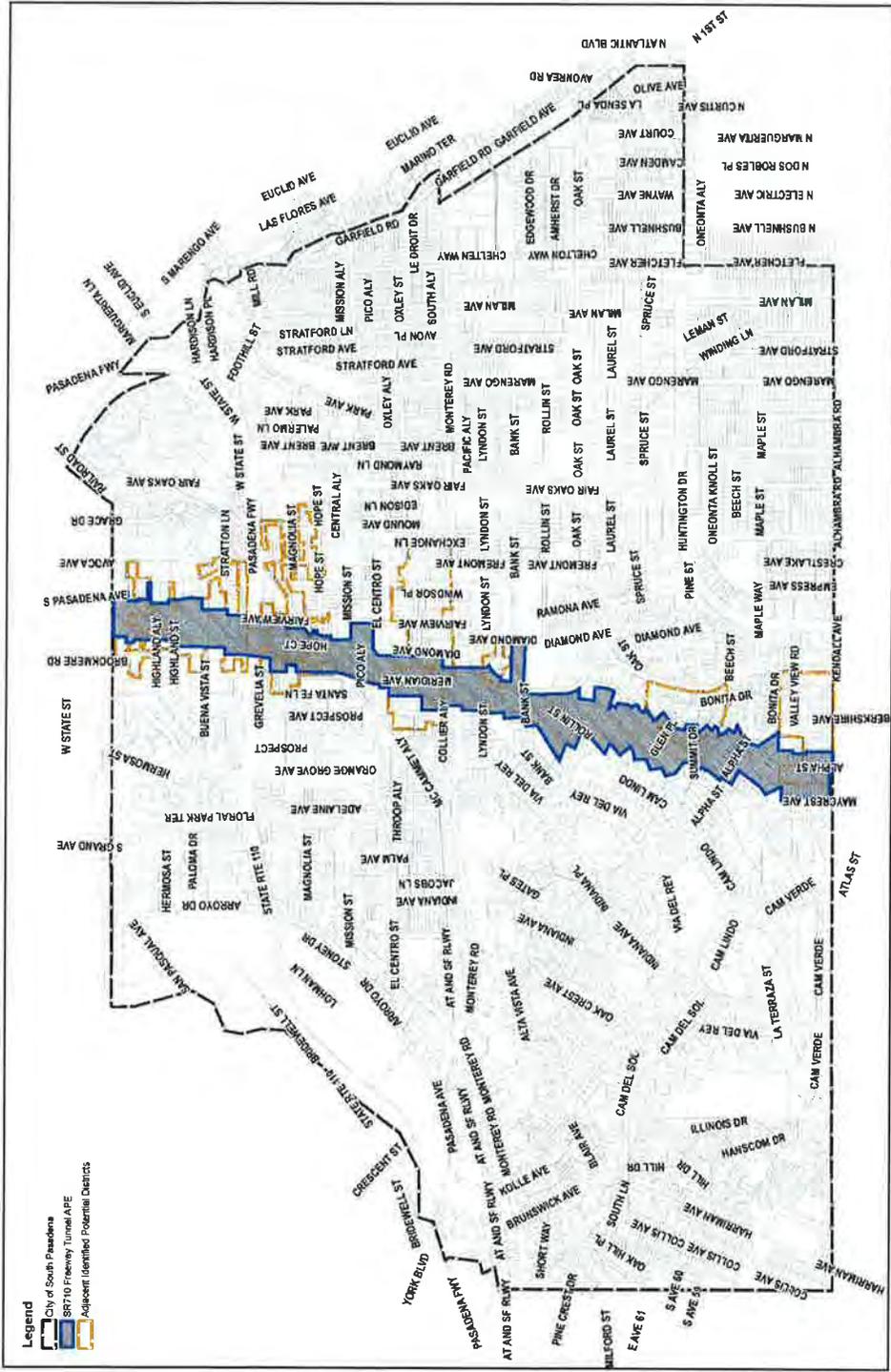


Figure 1: 2015 Phase 1 Survey Area

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey

Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

GUIDELINES FOR EVALUATION

A property may be designated as historic by National, State, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

National Register of Historic Places

The National Register of Historic Places is an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment.⁷ The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects; eligibility for federal tax benefits; and qualification for Federal

assistance for historic preservation, when funds are available.

To be eligible for listing and/or listed in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of an historic resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive Federal funding, a clearance process must be completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, state and local regulations may apply to properties listed in the National Register.

The criteria for listing in the National Register follow guidelines established by the National Park Service for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

- A. That are associated with events that have made a significant

⁷ 36CFR60, Section 60.2.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

contribution to the broad patterns of our history; or

- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.⁸

Integrity

In addition to having historic significance as outlined in the designation criteria, a property must retain sufficient integrity to convey its significance. Integrity is the authenticity of a property's historic identity as evidenced by the survival of physical

characteristics that existed during the property's historic period.⁹ The National Park Service has defined the following seven aspects of integrity:¹⁰

- **Location:** The place where the historic property was constructed or the place where the historic event occurred.
- **Design:** The combination of elements that create the form, plan, space, structure, and style of a property.
- **Setting:** The physical environment of a historic property.
- **Materials:** The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- **Workmanship:** The physical evidence of the crafts of a particular culture of people during any given period in history or prehistory.

⁸ 36CFR60, Section 60.3.

⁹ Properties have been evaluated based upon the integrity they possess at the time of the field survey. If a property is rehabilitated according to preservation guidelines it may become eligible for designation in the future; however, the property would need to be re-evaluated in order to make that determination.

¹⁰ *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. Washington D.C.: U.S. Department of the Interior, National Park Service, 1995.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

- **Feeling:** A property's expression of the aesthetic or historic sense of a particular period of time.
- **Association:** The direct link between an important historic event or person and a historic property.

California Register of Historical Resources

The California Register is an authoritative guide in California used by State and local agencies, private groups, and citizens to identify the State's historical resources.¹¹

The criteria for eligibility for listing in the California Register are based upon National Register criteria. Properties are eligible for listing in the California Register that are:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction

or represents the work of a master or possesses high artistic values.

4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register includes the following:

- California properties formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register of Historic Places.
- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for the California Register in accordance with procedures to be adopted by

¹¹ California PRC, Section 5023.1(a).

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

the State Historical Resources Commission (commission).

- Points of historical interest which have been reviewed by the OHP and recommended for listing by the commission for inclusion in the California Register in accordance with criteria adopted by the commission.¹²

Local Designation

The City of South Pasadena's Cultural Heritage Ordinance as updated in 1992 contains criteria for the local designation of historic resources:

Section 2.73A-14(a)(2) Designation Criteria for Landmarks and Historic Districts.

Criteria and standards for the designation of landmarks and historic districts shall include any or all of the following, as applicable:

- (A) Its character, interest or value as a part of the heritage of the community;
- (B) Its location as a site of a significant historic event;
- (C) Its identification with a person, persons or groups who significantly contributed to the

culture and development of the city, state or United States;

- (D) Its exemplification of a particular architectural style of an era of history of the city;
- (E) Its exemplification of the best remaining architectural type in a neighborhood;
- (F) Its identification as the work of a person or persons whose work has influenced the heritage of the city, the state or the United States;
- (G) Its embodiment of elements of outstanding attention to architectural design, engineering, detail design, detail, materials or craftsmanship;
- (H) Its being a part of or related to a square, park or other distinctive area which should be developed or preserved according to a plan based on a historic cultural or architectural motif;
- (I) Its unique location or singular physical characteristic representing an established and familiar visual feature of a neighborhood;

¹² California PRC, Section 5023.1(d).

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

- (J) Its potential of yielding information of archaeological interest;
 - (K) Its integrity as a natural feature or environment that strongly contributes to the well-being of the people of the city;
 - (L) Its significance as a distinguishable neighborhood or area whose components may lack individual distinction;
 - (M) With respect to the designation of a historic district, not less than fifty percent plus one of all affected owners of the proposed historic district must consent to such designation. Each parcel or lot shall be entitled to only one vote per parcel or lot. By way of example only, if the proposed historic district were composed of twenty parcels, then eleven property owners would be required to consent to the designation;
 - (N) Subject to review and approval by the city council, the commission may by resolution adopt additional or more detailed criteria and standards for the determination of designation of landmarks and historic districts.
- to districts. In addition, Section 2.73A-14(a)(2)(N) allows for the commission to adopt by resolution additional and more detailed criteria and standards for the designation of landmarks and historic districts subject to the review and approval of the city council.

Section 2.73A-14(a) (2) (H), (L) and (M) provide criteria specifically related

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

PHASE 1 METHODOLOGY

At the outset of the project, HRG reviewed all previous evaluations for properties within the Phase 1 Survey Area. This included those properties identified in the City Inventory of Addresses; evaluated as potentially eligible in previous survey efforts on behalf of the City of South Pasadena; listed in the California Historical Resources Inventory (HRI); and identified as potential historic resources in the cultural resources study of the DEIR.

Notes on the cultural resources study of the DEIR:

- There is a Programmatic Agreement addressing the survey methodology for the 710 study to ensure compliance with Section 106;¹³ the general framework outlined in the Programmatic Agreement was also used to review potential historic resources under the California Environmental Quality Act (CEQA).
- Although Caltrans is the Lead Agency, survey findings were submitted to the California State Historic Preservation Officer (SHPO) for review and comment.
- The DEIR includes letters of concurrence between Caltrans and the SHPO regarding the APE and the properties that will be considered resources under CEQA, along with other documents addressing cultural resources determinations in Attachment H of the DEIR.¹⁴
- In general, the cultural resources study of the DEIR looked at properties constructed before 1971.
- In the cultural resources study of the DEIR, potential historic resources within the APE and in the adjacent districts were evaluated for eligibility for listing in the National Register of Historic Places and the California Register of Historical Resources; properties were not evaluated for eligibility under the local ordinance.

¹³ Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as it Pertains to the Administration of the Federal-Aid Highway Program in California, January 1, 2014.

¹⁴ Correspondence from Carol Rowland-Nawi, State Historic Preservation Officer to Kelly Ewing Toledo, Heritage Resource Coordinator, Caltrans District 7 Division of Environmental Planning, February 25, 2015; and other correspondence included in Attachment H: Determination Documentation of the DEIR.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

The 2015 Phase 1 survey evaluated properties according to the contexts and themes outlined in the South Pasadena Historic Context Statement. Individual properties and potential historic districts were evaluated for designation at the federal, state, and local levels. Data collected by previous survey efforts, including the cultural resources study of the DEIR, informed this effort. The findings of the cultural resources study and the concurrence letters between SHPO and Caltrans were consulted; however an independent review of all properties within the APE and in the immediately adjacent potential historic districts was undertaken as part of the 2015 Phase 1 Survey effort. Properties that have been designated or formally determined eligible for designation were not re-evaluated as part of this effort.

This survey was conducted according to current professional standards and procedures developed by the National Park Service and the California Office of Historic Preservation.

Data Management

All property-specific information has been compiled into an Access-based database that will become part of the complete database for the Citywide

Historic Resources Survey (Phases 1, 2, and 3). The database includes baseline data for each property per the Los Angeles County Tax Assessor (address, Assessor Parcel Number, date of construction, and property type); California Historical Resources Status Codes ("Status Code") for properties listed in the City Inventory of Addresses¹⁵ and/or the HRI, where applicable. The database is compatible with ARC GIS and therefore all survey findings can be linked to the City's GIS system.

Field Survey

Informed by a knowledge of the City's historic periods of development and their associated themes and property types, a focused investigation of the Phase 1 Survey Area was conducted in May 2015. Factors of the analysis included historic integrity, architectural style, neighborhood cohesion, and relationships to larger development patterns in the area.

Data gathered in the field includes a digital photograph, and the recordation of current use, number of stories, architectural style, and alterations. As all properties within the Phase 1 survey have been surveyed previously,

¹⁵ Note that the status codes in the City Inventory of Addresses date to 2003, before the SHPO updated all the codes. The codes in the database in the Inventory of Addresses field were entered as they currently

appear and therefore do not reflect the updated codes. All status codes assigned by HRG will be updated to be consistent with current codes.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

architectural descriptions were not undertaken as part of this effort, consistent with requirements for updates to DPR forms.

Analysis

Analysis of the compiled data was conducted to determine the types of properties identified as potential resources in previous surveys and the associated integrity thresholds for each resource type. HRG evaluated each property according to the contexts, themes, eligibility standards, and integrity thresholds as outlined in the South Pasadena Historic Context Statement. The analysis considers rarity of type or style; historic association; and relationship to larger development patterns in the area.

Each surveyed property was evaluated for eligibility for listing in the National Register, the California Register, and for local designation as an individual historic resource and/or as part of a historic district. Neighborhoods that may not retain sufficient integrity for designation as historic districts were also evaluated as potential local planning districts. The evaluations include a brief statement of significance and the assignment of the appropriate Status Code.¹⁶

Maps

Maps were produced from the survey data that identify the individually eligible properties, along with any potential historic districts. Standard preservation practice defines the boundaries of an historic property as the parcel on which an historic structure is situated.

¹⁶ Status codes are discussed further in the Phase I Survey section below.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

PHASE 1 SURVEY FINDINGS

Overview

There are approximately 325 properties within the APE for the SR 710 DEIR.¹⁷ In addition, more than 400 properties are located within potential historic districts partially located within the APE or immediately adjacent. The APE and the immediately adjacent potential historic districts comprise the Phase 1 Survey Area (see Figure 1). The Phase 1 survey results for these properties are outlined in this section.

The majority of the properties within the Phase 1 Survey Area are residential; of these, most are single-family with some multi-family examples. Included within the Phase 1 Survey Area is the South Pasadena Commercial Historic District, which is listed in the National Register of Historic Places. With the exception of a small number of parcels, this district comprises all of the commercial properties within the Phase 1 Survey Area. As the commercial district is already designated, it was not re-surveyed as part of this effort.

The applicable contexts and themes used to evaluate properties within the Phase 1 Survey Area are:

- Context: Town Settlement and Late 19th Century Development (1870-1899)

Properties within the Survey Area evaluated under this context include single-family residences that are associated with the City's early development. During this period the City was incorporated, and some of the earliest neighborhoods were established. Resources from this period are rare.

- Context: Early 20th Century Development (1900-1919)
 - Theme: Early Residential Development (1900-1919)

Residential development during this period was a major catalyst of growth in the City and neighborhoods of bungalows and two-story residences were constructed to accommodate the growing population.

¹⁷ The DEIR has defined the APE as just above the tunnel imprint, not properties lateral to that imprint that would also be affected. Several potential historic

districts immediately adjacent to the APE were also reviewed as part of the cultural resources study in the DEIR.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

- Context: 1920s Growth (1920-1929)
 - Theme: 1920s Residential Development (1920-1929)

In South Pasadena the 1920s represented a period of growth and prosperity.

- Context: Architecture and Design
 - Theme: Craftsman
 - Theme: Period Revival
 - Theme: Mid-Century Modern

California Historical Resource Status Codes

Each property has been assigned the appropriate Status Code. These codes are used by the California State Office of Historic Preservation to reflect designations or eligibility for the National Register of Historic Places, the California Register of Historical Resources, and for local designation.¹⁸

The State Office of Historic Preservation provides the following qualifying statement in its guidance for using the Status Codes:

The status codes are broad indicators which, in most cases, serve as a starting place for further consideration and evaluations. Because the assigned status code reflects an opinion or action taken at a specific point in time, the assigned status code may not accurately reflect

the resource's eligibility for the National Register, California Register, or local listing or designation at some later time. Individuals and agencies attempting to identify and evaluate historical resources need to consider the basis for evaluation upon which a particular code was assigned, i.e., date of evaluation, the reason and criteria applied for evaluation, the age of the resource at the time of evaluation, and any changes that may have been made to the resource that would impact its integrity.¹⁹

A list of the current Status Codes established by the California Office of Historic Preservation can be found in Appendix A. The most commonly applied Status Codes in this survey are as follows:

- **3D/3CD/5D3**
Appears eligible for NR/CR/local as a contributor to an eligible district through survey evaluation.
- **3B/3CB/5B**
Appears eligible for NR/CR/local both individually and as a contributor to an eligible district through survey evaluation.
- **3S/3CS/5S3**
Appears eligible for NR/CR/local as an individual property through survey evaluation.

¹⁸ Note that effective August 2003, the Status Codes were revised by the California Office of Historic Preservation.

¹⁹ California State Office of Historic Preservation, *Technical Assistance Bulletin #8*, 5-6.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

- **6L**
Determined ineligible for local listing or designation through local review process; may warrant special consideration in local planning.
- **6Z**
Found ineligible for local designation through survey evaluation.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

SURVEY RESULTS: INDIVIDUALLY ELIGIBLE HISTORIC RESOURCES

Of the approximately 325 properties within the APE,²⁰ there are eight properties that have been designated at the federal, state, or local levels; these properties are identified in Appendix B. Approximately 76 properties within the APE are listed in the California Historical Resources Inventory (HRI); these properties are identified in Appendix C.

The Phase 1 survey identified an additional thirty-four properties that appear eligible for listing at the federal, state, and/or local levels within the Phase 1 Survey Area. These properties are identified in the list in Appendix D.

Designated and identified individual resources are included on the map in Figure 2.

²⁰ Note that the APE is different than the Phase 1 Survey Area; the Phase 1 Survey Area includes the APE and the immediately adjacent potential historic districts. In addition, HRC identified individually-

eligible properties that are also district contributors. The cultural resources study looked at individual resources located within the APE, but not within the adjacent historic districts.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

HISTORIC DISTRICTS

Designated Historic Districts

There are five historic districts partially or wholly within the APE or immediately adjacent that have been designated at the federal, state, or local levels. Designated historic districts were not been re-surveyed as part of this effort.

The designated historic districts are:

- Arroyo Seco Parkway Historic District
- North of Mission Historic District
- Oaklawn Historic District
- South of Mission Historic District
- South Pasadena Historic Business District

Identified Historic Districts

There are six historic districts that are wholly or partially within the APE that were determined eligible by previous surveys and are included in the City Inventory of Addresses.²¹ These same districts were re-evaluated as part of the cultural resources study for the DEIR, and they were surveyed by HRG as part

of the 2015 Phase 1 survey. These districts are:

- El Cerrito Circle Historic District
- Valley View Heights
- Gillette Crescent Neighborhood
- Buena Vista/Prospect Addition
- Library Neighborhood
- North of Mission District Addition

Of these, the cultural resources study of the DEIR determined that only the El Cerrito Circle Historic District meets eligibility criteria for listing in the National and California Registers. The SHPO concurred with this findings, with the exception of the Library Neighborhood Historic District, which per the SHPO is eligible for listing in the National Register. In accordance with Section 106 Programmatic Agreement Stipulation VIII.C.4, the SHPO is assuming that the Library Neighborhood Historic District is eligible for listing in the National Register for purposes of the project.²²

²¹ There is one additional district, the Pasadena Avenue Historic District that is primarily in the City of Pasadena. There are only four parcels that are within this district that are located within the City of South Pasadena. These properties are listed in the City

Inventory of Addresses and are identified in the cultural resources study of the EIR. They were not re-surveyed as part of this effort.

²² Addendum, "Historic Property Survey Report SR 710 North Study Project."

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

Phase 1 Historic Districts Survey

Findings: Eligible Districts

As part of the Phase 1 survey, HRG reviewed all potential historic districts within or adjacent to the APE. HRG identified the following districts as eligible for listing at the federal, state, and/or local levels:

- El Cerrito Circle Historic District²³
- Gillette Crescent Neighborhood²⁴
- Library Neighborhood²⁵

El Cerrito Circle Historic District

The El Cerrito Circle Historic District was determined eligible under the following contexts:

- Context: 1920s Growth (1920-1929); Theme: 1920s Residential Development
- Context: Architecture and Design; Theme: Period Revival Styles

The period of significance for the district is 1927-1931. There are ten properties within the boundary for the

district; of these, all ten (or 100%) are contributors to the district. Contributors are one- and two-story single-family residences, typically rectangular or L-shaped in plan. The district is laid out in a circular street pattern, with mature street trees, and lush, mature landscaping.

The El Cerrito Circle Historic District represents an excellent and intact collection of single-family residential development dating to the late 1920s, and an excellent and intact collection of Period Revival architectural styles. The 1920s was a period of significant population growth in the City. The residential character established in the early 20th century continued in the 1920s, and there remains a strong collection of residential neighborhoods with examples from this period.

A map of the El Cerrito Historic District indicating contributors and non-contributors is included in Figure 3.



1307 Diamond Avenue. Contributor to the El Cerrito Circle Historic District.

²³ Listed in the City Inventory of Addresses, identified as eligible in the cultural resources study of the DEIR; concurrence from HRG.

²⁴ Listed in the City Inventory of Addresses; previously determined not eligible for listing in the National Register of Historic Places; identified as not eligible for the National or California Registers in the cultural

resources study of the DEIR; identified by HRG as eligible for listing.

²⁵ Listed in the City Inventory of Addresses; identified as not eligible in the cultural resources study of the DEIR; identified as eligible per the SHPO; HRG concurs with SHPO evaluation.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

El Cerrito Circle District



Figure 3: El Cerrito Circle Historic District

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

Gillette Crescent Historic District

The Gillette Crescent Historic District was determined eligible under the following contexts:

- Context: 1920s Growth (1920-1929); Theme: 1920s Residential Development
- Context: Architecture and Design; Theme: Period Revival Styles

The period of significance for the district is 1920-1939. There are sixty-two properties within the district boundary; of these, thirty-six (or 58%) are contributors to the district. The Gillette Crescent Historic District represents an intact collection of single-family residential development dating to the late 1920s, and an excellent and intact collection of Period Revival architectural styles. The district represents a small enclave with an unusual street pattern and it retains a strong sense of time and place.

The Gillette Crescent neighborhood was originally identified as a potential historic district in 1996 as part of a Caltrans survey. The Keeper of the National Register determined it ineligible for listing in the National Register on February 24, 1997. It was re-surveyed in 2002 by PCR Services Corporation for the City of South Pasadena. The 2002 survey indicated that it might be eligible for designation as a historic district under the local

ordinance; however, the City has not formally designated it. In 2007-2008 the Gillette Crescent neighborhood was subject to a re-survey under PRC 5024. Caltrans reaffirmed the Keeper's 1997 determination that it does not meet the criteria for inclusion in the National Register or the California Register of Historical Resources because of alterations to the historic street pattern, density, and spatial relationships. The related Historic Resources Evaluation Report (HRER) was updated in 2013 and the State Historic Preservation Officer (SHPO) re-affirmed the determination on October 25, 2013.

A map of the Gillette Crescent Historic District indicating contributors and non-contributors is included in Figure 4. It is HRC's professional opinion that the Gillette Crescent neighborhood retains sufficient integrity for designation as a historic district.



1701 Meridian Avenue. Contributor to the Gillette Crescent Historic District.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

Gillette Crescent Neighborhood District



Figure 4: Gillette Crescent Historic District

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

Library Neighborhood Historic District

The Library Neighborhood Historic District was determined eligible under the following contexts:

- Context: Early 20th Century Development; Theme: Early 20th Century Residential Development
- Context: Architecture and Design; Theme: Craftsman

The period of significance for the district is 1900-1930. There are ninety-four properties within the district boundary; of these, sixty-five (or 69%) are contributors to the district. The Library Neighborhood Historic District represents an intact collection of single-family residential development dating to the early 20th century, and an excellent and intact collection of period architectural styles, primarily Craftsman. The first decades of the 20th century marked one of the greatest population increases in the history of South Pasadena, and development activity reflected the demand for single-family housing. During this period, the influence of the Arts and Crafts movement is reflected in South Pasadena's residential neighborhoods. The City retains intact streets and neighborhoods illustrating the importance of Arts and Crafts architecture and the role it played in residential development in the early 20th century. The Library

Neighborhood Historic District retains a strong sense of time and place and continues to reflect an important period in South Pasadena history.

A map of the Library Neighborhood Historic District indicating contributors and non-contributors is included in Figure 5.



Context view of the Library Historic District along Oxley Street.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

Library Neighborhood



Figure 5: Library Neighborhood Historic District

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

Phase 1 Historic Districts Survey Findings: Planning Districts

The following districts do not retain sufficient integrity for designation as historic districts. However, each of these districts retains a sense of time and place, they all reflect important periods of development in the city's history, and they all retain characteristics or planning features that should be recognized. Therefore, it is recommended that the following districts be given consideration for local planning purposes (status code 6L):²⁶

- Valley View Heights
- Buena Vista/Prospect Addition
- North of Mission District Addition

Valley View Heights

Valley View Heights was evaluated as a potential historic district with a period of significance of 1906-1929. There are seventy-five properties located within the district boundary; of these, thirty-six (or 48%) are contributors. Therefore, the district does not retain sufficient integrity for designation at the federal, state, or local levels. However, due to the neighborhood's early period of development and the extant examples

²⁶ Planning districts are for consideration by the local jurisdiction, but are not considered historical resources for purposes of CEQA.

of early 20th century single-family residences, it is recommended that Valley View Heights be considered a planning district by the City of South Pasadena. In addition, a number of properties in Valley View Heights were identified as individually eligible for local designation.

Valley View Heights is a small tract located in the southern portion of South Pasadena adjacent to the El Sereno neighborhood of Los Angeles. It was located near the Berkshire Station and boasted a direct line to downtown Los Angeles. Transportation-related development played a critical role in the growth of South Pasadena in the early 20th century. Several significant residential tracts were subdivided during this period that advertised their proximity to the anticipated location of the Pasadena Short Line.

A map of Valley View Heights is included in Figure 6.



2057 Meridian Avenue. Located in Valley View Heights.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

Valley View Heights

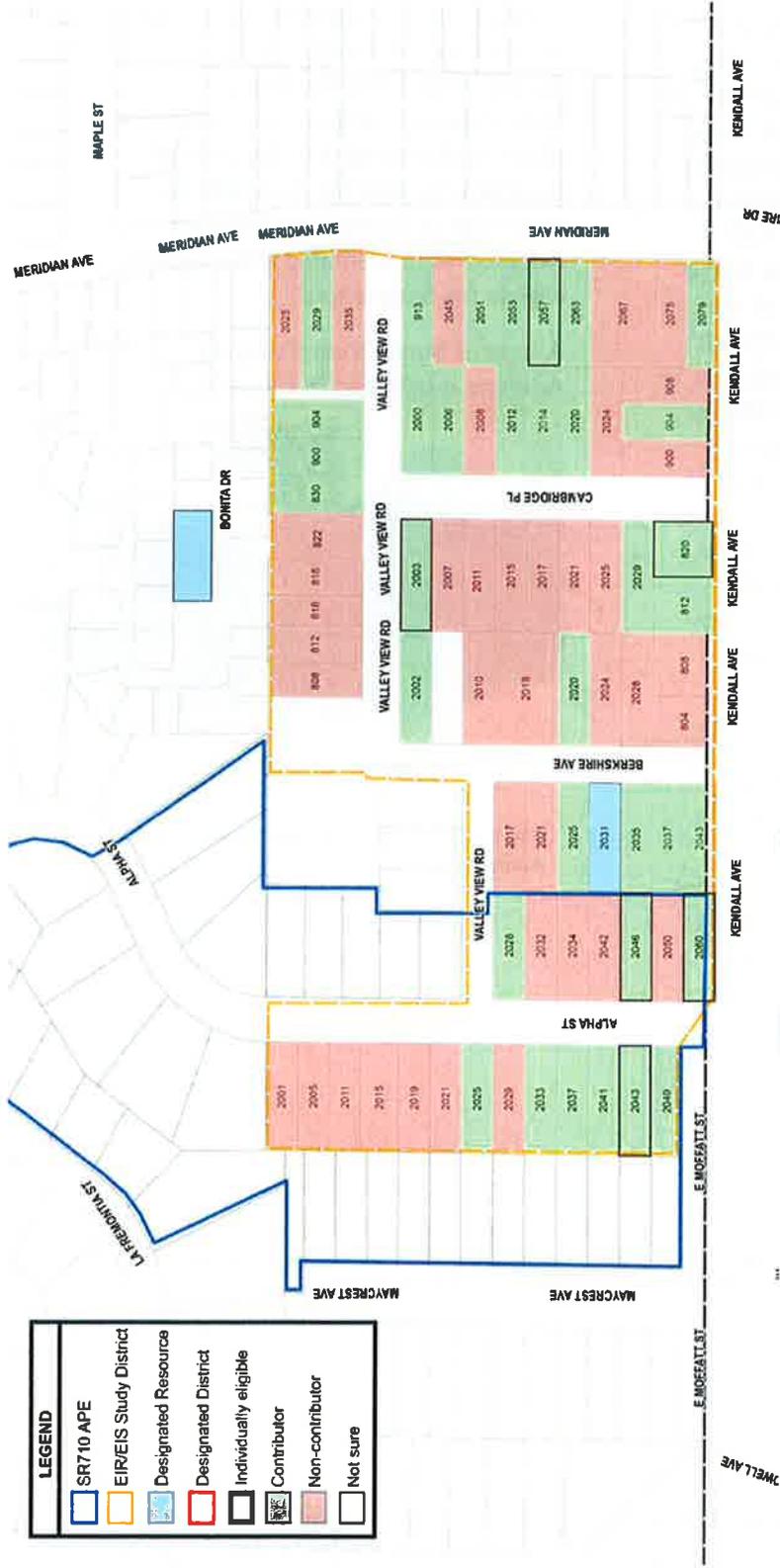


Figure 6: Valley View Heights Planning District

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

Buena Vista/Prospect Addition²⁷

The Buena Vista/Prospect Addition was evaluated as a potential historic district with a period of significance of 1896-1939. There are 104 properties located within the district boundary; of these, thirty (or 29%) are contributors to the district. Within the identified district boundary are entire streets of infill development that do not relate to the original development context of the Buena Vista/Prospect neighborhood; these include Foothill Street and Fremont Avenue, which are primarily populated with modest one-story residences from the 1940s. As part of the analysis during the Phase 1 survey, HRG considered revising the district boundary in order to find a smaller district within this area; however, no contiguous smaller collection was identified.

The Buena Vista/Prospect neighborhood is a significant early neighborhood with a number of prominent, individually eligible residences. The neighborhood includes features such as stone retaining walls, original curbs and sidewalks, and mature street trees. Although it does not retain sufficient integrity for designation as a historic district, due to its early development period,

association with prominent residents, significant individual works of architecture, and prominent planning features and amenities, it is recommended that the Buena Vista/Prospect Addition be considered a planning district by the City of South Pasadena. In addition, a number of properties in Buena Vista/Prospect Addition were identified as individually eligible for designation.

A map of Buena Vista/Prospect Addition is included in Figure 7.



930 Oliver Street. Located in Buena Vista/Prospect Addition.

²⁷ The potential Buena Vista/Prospect Addition Historic District is pending further discussion and

review of the nomination for local designation that has been submitted to the City.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

North of Mission District Addition

The North of Mission District Addition was evaluated as a potential historic district with a period of significance of 1895-1930. There are 114 properties located within the district boundary; of these, fifty-nine (or 52%) are contributors. The North of Mission Addition represents a collection of single-family residential development dating to the late 19th and early 20th centuries, and represents a variety of period architectural styles, primarily Craftsman.

The North of Mission Addition is contiguous with the North of Mission Historic District, which has been formally determined eligible for listing in the National Register and is listed in the California Register. However, due to alterations to individual buildings within the North of Mission Addition and the interruption of the original street pattern and neighborhood cohesiveness by the rail line that cuts diagonally through the center of the district, it no longer appears eligible for designation at the federal, state, or local levels. However, due to the early period of development in the neighborhood and the extant examples of early 20th century single-family residences, it is recommended that the North of Mission District Addition be considered a planning district by the City of South Pasadena. In addition, a number of properties in the North of Mission District Addition

were identified as individually eligible for local designation.

A map of North of Mission Addition is included in Figure 8.



712 Mound Avenue. Located in North of Mission Addition.



1038 Magnolia Street. Located in North of Mission Addition.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

North of Mission District Addition

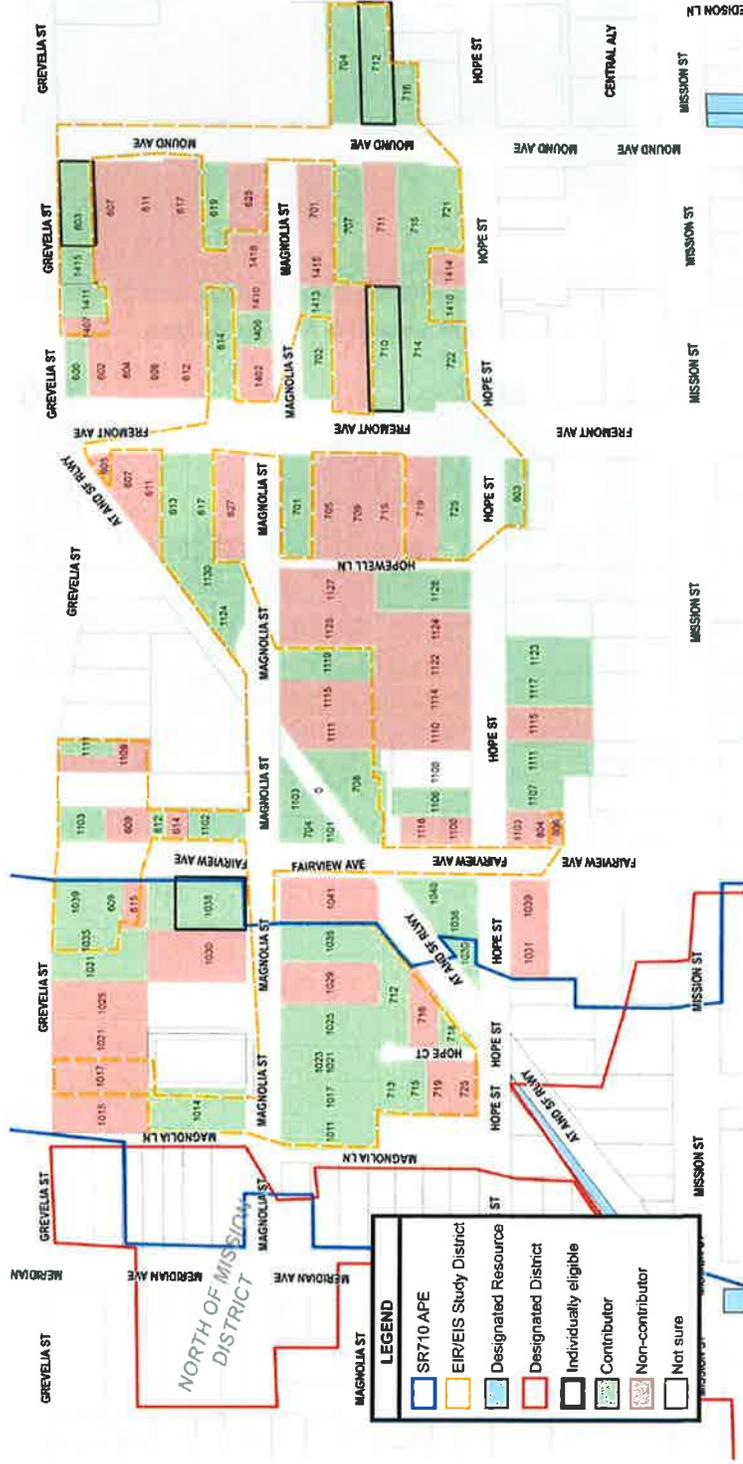


Figure 8: North of Mission District Addition Planning District

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

**Phase 1 Historic Districts Survey
Findings: Altos de Monterey**

Altos de Monterey is the only large-scale, comprehensive residential development from the post-World War II period in South Pasadena. It was developed with single-family residences between 1953 and 1972. It is located almost wholly outside the APE; however, there is a small swath of properties that are part of the Altos de Monterey development that intersect with the APE. Based on preliminary reconnaissance of the area, it does not appear as though the entire Altos de Monterey development is eligible for designation as a historic district; however, additional fieldwork and research is required to make a final determination.

For purposes of the Phase 1 survey, individual residences that are excellent examples of Mid-Century Modern architecture located within the Altos de Monterey development and the APE were surveyed and assigned the status code 7R.²⁸

A map of Altos de Monterey is included in Figure 9.



1870 Alpha Street. Located in Altos de Monterey.



1906 Alpha Street. Located in Altos de Monterey.

²⁸ 7R indicates a property that was identified in a reconnaissance-level survey but not evaluated.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

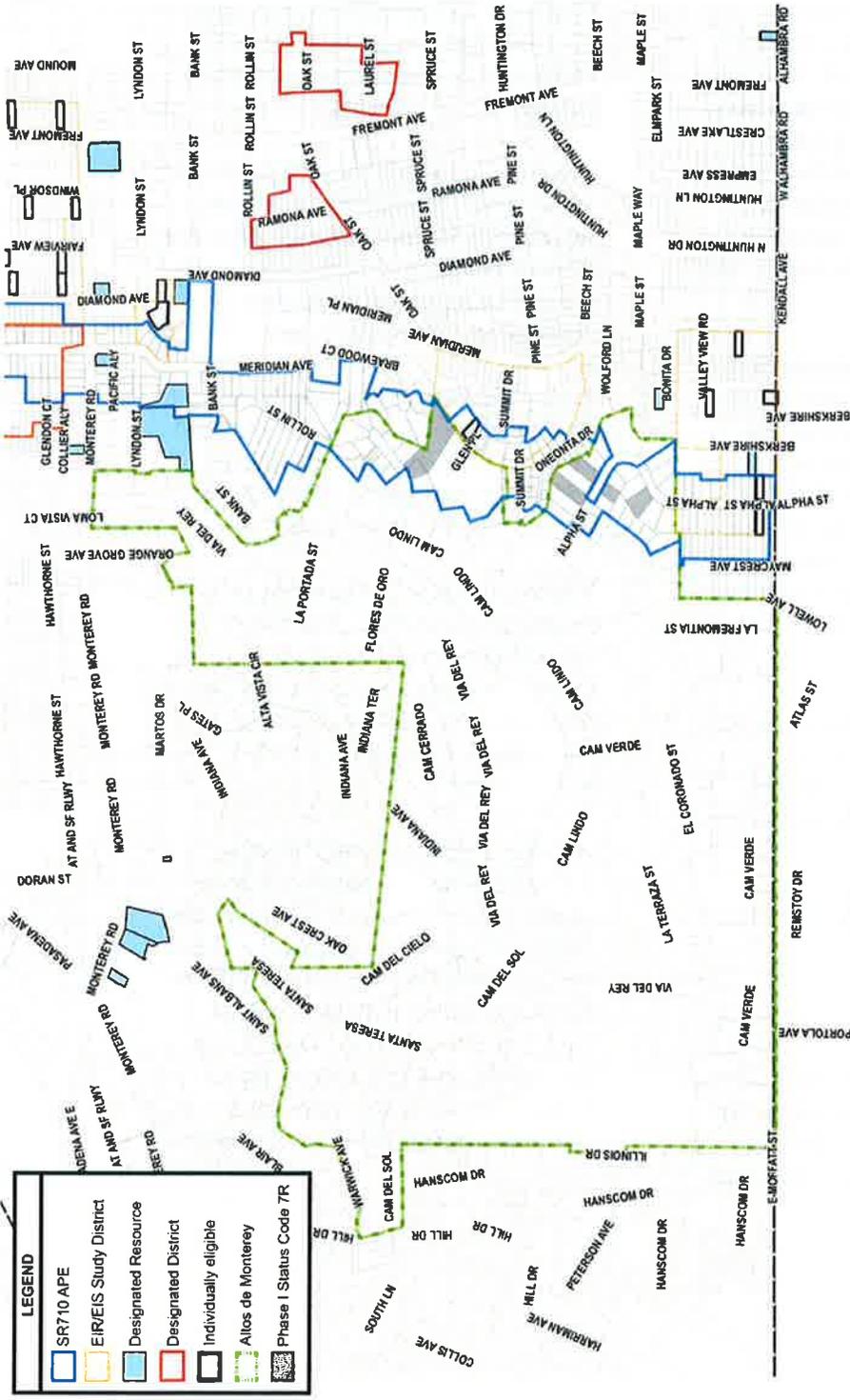


Figure 9: Altos de Monterey

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

GLOSSARY OF TERMS

The following terms are used throughout this report. They describe established historic preservation concepts that are based in cultural resources law at the Federal, state, and local levels. These concepts have been codified in standards and guidelines developed by the National Park Service, the Department of the Interior, and professional practitioners, including historians, architects, archeologists, and urban planners.

California Historical Resource Status Code is the numerical system adopted by the California Office of Historic Preservation to classify Historic Resources that have been identified through a regulatory process or local government survey in the Statewide Historic Resources Inventory database maintained by the California Office of Historic Preservation.

Contributor is any building, structure, site, or object located within a designated Historic District which adds to the historical integrity or architectural qualities that make the Historic District significant. Contributors to designated Historic Districts are considered Historic Resources.

Designation is the act of recognizing, labeling, or listing a property as being historic. Properties may be designated at the Federal level as a National Historic Landmark or listed in the National Register of Historic Places, at the state

level as a California Historical Landmark, California Point of Historical Interest, or listed in the California Register of Historical Resources, or at the local level. Designation formally establishes by law or ordinance that a building or site has significance.

Historic Context is the area or domain within which a property has historic significance. Historic contexts allow for an understanding of how the property is a part of an important historic development or event.

A **Historic District** is a significant concentration, linkage or continuity of sites, buildings, structure or objects united historically or aesthetically by plan or physical development.

Historic Integrity is the ability of a property to convey its significance. It is the authenticity of a property's historic identity as evidenced by the survival of physical characteristics and materials that existed during the property's historic period.

Historic Resource is any building, structure, object, or site that is listed in or determined eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, either individually or as a contributor to a Historic District; has been designated as a historic resource by the City of South Pasadena; meets at least one of the Criteria for Designating

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

a Historic Landmark; or is identified as a Contributor to a Historic District.

The **Historic Resources Inventory** is the list of buildings, structures, objects, or sites that are identified as Historic Resources or potential Historic Resources through survey or other evaluation; are included on any list of historic and cultural resources, including, but not limited to, the National Register of Historic Places, the California Register, and the Statewide Historic Resources Inventory (with a California Historic Resource Status Code of 1-5); or are designated Historic Landmarks or Contributors to a Historic District by the City Council.

A **Historic Resources Survey** is the process by which a community's historic resources are identified and documented. A **reconnaissance-level survey** is a cursory look at an area with some general background research. Such a survey is typically used to broadly characterize the types of resources that would be found in an area, in order to guide future survey efforts. An **intensive-level survey** is a close and careful inspection of an area in order to precisely identify all historic resources in an area. Such a survey would include field observation, detailed background research, thorough documentation of all surveyed properties, and is typically accompanied by a historic context statement.

Historic Significance is the reason a property is important to the history, architecture, archaeology, engineering, or culture of a community, state, or the nation. Significance is defined by the area of history in which the property made an important contribution and by the period of time when these contributions were made. Establishing historic significance is necessary to demonstrate that a property has been evaluated within the proper historic context and according to appropriate, legally established criteria, such as those required for listing in the National Register of Historic Places, the California Register of Historical Resources, or a local landmark program.

The South Pasadena **Inventory of Addresses** was adopted by the City Council on November 30, 1994. The Inventory of Addresses includes properties that are designated, formally determined eligible for federal, state, or local listing, or appear eligible for federal, state, or local listing. In accordance with the City's Cultural Heritage Ordinance, all properties on the Inventory are considered historic resources for the purposes of the California Environmental Quality Act (CEQA).

The **National Register of Historic Places** is the official inventory of sites, buildings, structures objects and districts significant in American history, architecture, archeology and culture and is maintained by the Secretary of the

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

Interior under the authority of the Historic Sites Act of 1935 and the National Historic Preservation Act of 1966.

Non-contributor is any building, structure, or object located within a designated Historic District which does not add to the historical integrity or architectural qualities that make the Historic District significant. Non-contributors to designated Historic Districts are not considered Historic Resources.

A **Period of Significance** is the span of time during which a property was associated with important events, activities, or persons, or attained the characteristics that qualify it as historic. A resource may have more than one period of significance.

The **Secretary of the Interior's Standards and Guidelines** are the standards used in the preservation, rehabilitation, restoration, or reconstruction of a historic property. "The Standards" delineate accepted treatments for the protection and rehabilitation of historic materials.

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

APPENDIX A: CALIFORNIA HISTORICAL RESOURCES STATUS CODES

California Historical Resource Status Codes	
1	Properties listed in the National Register (NR) or the California Register (CR)
1D	Contributor to a district or multiple resource property listed in NR by the Keeper. Listed in the CR.
1S	Individual property listed in NR by the Keeper. Listed in the CR.
1CD	Listed in the CR as a contributor to a district or multiple resource property by the SHRC
1CS	Listed in the CR as individual property by the SHRC.
1CL	Automatically listed in the California Register – Includes State Historical Landmarks 770 and above and Points of Historical Interest nominated after December 1997 and recommended for listing by the SHRC.
2	Properties determined eligible for listing in the National Register (NR) or the California Register (CR)
2B	Determined eligible for NR as an individual property and as a contributor to an eligible district in a federal regulatory process. Listed in the CR.
2D	Contributor to a district determined eligible for NR by the Keeper. Listed in the CR.
2D2	Contributor to a district determined eligible for NR by consensus through Section 106 process. Listed in the CR.
2D3	Contributor to a district determined eligible for NR by Part I Tax Certification. Listed in the CR.
2D4	Contributor to a district determined eligible for NR pursuant to Section 106 without review by SHPO. Listed in the CR.
2S	Individual property determined eligible for NR by the Keeper. Listed in the CR.
2S2	Individual property determined eligible for NR by a consensus through Section 106 process. Listed in the CR.
2S3	Individual property determined eligible for NR by Part I Tax Certification. Listed in the CR.
2S4	Individual property determined eligible for NR pursuant to Section 106 without review by SHPO. Listed in the CR.
2CB	Determined eligible for CR as an individual property and as a contributor to an eligible district by the SHRC.
2CD	Contributor to a district determined eligible for listing in the CR by the SHRC.
2CS	Individual property determined eligible for listing in the CR by the SHRC.
3	Appears eligible for National Register (NR) or California Register (CR) through Survey Evaluation
3B	Appears eligible for NR both individually and as a contributor to a NR eligible district through survey evaluation.
3D	Appears eligible for NR as a contributor to a NR eligible district through survey evaluation.
3S	Appears eligible for NR as an individual property through survey evaluation.
3CB	Appears eligible for CR both individually and as a contributor to a CR eligible district through a survey evaluation.
3CD	Appears eligible for CR as a contributor to a CR eligible district through a survey evaluation.
3CS	Appears eligible for CR as an individual property through survey evaluation.
4	Appears eligible for National Register (NR) or California Register (CR) through other evaluation
4CM	Master List - State Owned Properties – PRC §5024.
5	Properties Recognized as Historically Significant by Local Government
5D1	Contributor to a district that is listed or designated locally.
5D2	Contributor to a district that is eligible for local listing or designation.
5D3	Appears to be a contributor to a district that appears eligible for local listing or designation through survey evaluation.
5S1	Individual property that is listed or designated locally.
5S2	Individual property that is eligible for local listing or designation.
5S3	Appears to be individually eligible for local listing or designation through survey evaluation.
5B	Locally significant both individually (listed, eligible, or appears eligible) and as a contributor to a district that is locally listed, designated, determined eligible or appears eligible through survey evaluation.
6	Not Eligible for Listing or Designation as specified
6C	Determined ineligible for or removed from California Register by SHRC.
6J	Landmarks or Points of Interest found Ineligible for designation by SHRC.
6L	Determined ineligible for local listing or designation through local government review process; may warrant special consideration in local planning.
6T	Determined ineligible for NR through Part I Tax Certification process.
6U	Determined ineligible for NR pursuant to Section 106 without review by SHPO.
6W	Removed from NR by the Keeper.
6X	Determined ineligible for the NR by SHRC or Keeper.
6Y	Determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or Local Listing.
6Z	Found ineligible for NR, CR or Local designation through survey evaluation.
7	Not Evaluated for National Register (NR) or California Register (CR) or Needs Reevaluation
7J	Received by OHP for evaluation or action but not yet evaluated.
7K	Resubmitted to OHP for action but not reevaluated.
7L	State Historical Landmarks 1-769 and Points of Historical Interest designated prior to January 1998 – Needs to be reevaluated using current standards.
7M	Submitted to OHP but not evaluated - referred to NPS.
7N	Needs to be reevaluated (Formerly NR Status Code 4)
7N1	Needs to be reevaluated (Formerly NR SC4) – may become eligible for NR w/restoration or when meets other specific conditions.
7R	Identified in Reconnaissance Level Survey: Not evaluated.
7W	Submitted to OHP for action – withdrawn.

12/8/2003

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

APPENDIX B: DESIGNATED RESOURCES IN APE

NO	STREET	APN	NAME	DATE	STATUS CODE OR LANDMARK #
1107	Buena Vista Street	5317-010-033	David M. Rabb Family	1910	#53
857	Bank Street	5314-017-001	Otake/Nambu House	c.1895	2S2
1120	Buena Vista Street	5317-011-026	Knox-Merwin-Porter House	1870	#42
1019	El Centro Street	5315006015	South Pasadena Bank Building	1904	#8
909	Lyndon Street	5314-023-007	East Wynyate	1896	#43
	Meridian Avenue		Watering Trough Waiting Station		#7
1000	Mission Street	5317-014-047	Century House	1903	5B1, #34
921	Monterey Road	5314-022-005	Kenneth W. Joy House	1912	2S2

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

APPENDIX C: PROPERTIES IN THE APE LISTED IN THE HRI

NO	STREET	APN	NAME	DATE	HRI STATUS CODE	CITY INVENTORY STATUS CODE	DEIR STATUS CODE
917	Buena Vista Street	5317-035-002	Albert Sherman Hoyt House	1901	2D	2B	
929	Buena Vista Street	5317-035-004	Childs House	1901	2D	2B	
1000	Buena Vista Street	5317-008-004	Charles P. Williams House	1903	2D	1S, 2S, 2B	
1133	Buena Vista Street	5317-010-037	Grosse House, Tanner House	1912	2S2	2S	
1127	Columbia Street	5317-012-031	Henry Stephen Boice House	1908	2D2	2S	
905	Diamond Avenue	5315-008-023	South Pasadena First National Bank	1907	1D		
1019	El Centro Street	5315-006-015	South Pasadena Bank Building	1928	1D		
1020	El Centro Street	5315-008-900	El Centro School	1928	1D		
1115	El Centro Street	5315-007-901; 5315-007-903	South Pasadena Public Library	1930	1D		
221	Fremont Avenue	5317-012-030	Sherry House	1908	2S2	2S	
1014	Glendon Way	5315-015-019		1885	2D2	2D	
1021	Glendon Way	5315-019-020		1910	2D2	2D	
1024	Glendon Way	5315-015-020		1908	2D2	2D	
1027	Glendon Way	5315-019-021		1885	2D2	2D	
1028	Glendon Way	5315-015-021		1907	2D2	2D	
1101	Glendon Way	5315-019-022		1911	2D2	2D	
1102	Glendon Way	5315-015-022		1893	2D2	2D	
1103	Glendon Way	5315-015-034		1900	2D2		
1105	Glendon Way	5315-019-023		1907	2D2	2D	

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

NO	STREET	APN	NAME	DATE	HRI STATUS CODE	CITY INVENTORY STATUS CODE	DEIR STATUS CODE
1110	Glendon Way	5315-015-900		1919	2D2	2D	
1111	Glendon Way	5315-018-028		1900	2D2	2D	
1112	Glendon Way	5315-015-042		1919	2D2	2D	
1115	Glendon Way	5315-018-030		1905	2D2	2D	
1118	Glendon Way	5315-015-044		1922	2D2	2D	
1119	Glendon Way	5315-018-031		1895	2D2	2D	
1123	Glendon Way	5315-018-045		1923	2D2	2D	
1126	Glendon Way	5315-015-045		1924	2D2	2D	
1007	Magnolia Street	5315-013-042		1920	2D2		
602	Meridian Avenue	5315-012-034		1914	2D2	2D	
606	Meridian Avenue	5315-012-033		1913	2D2	2D	
610	Meridian Avenue	5315-012-032		1915	2D2	2D	
612	Meridian Avenue	5315-012-031		1915	2D2	2D	
613	Meridian Avenue	5315-016-017		1895	2D2	2D	
616	Meridian Avenue	5315-012-030		1913	2D2	2D	
617	Meridian Avenue	5315-016-016		1915	2D2	2D	
620	Meridian Avenue	5315-012-029		1912	2D2	2D	
621	Meridian Avenue	5315-016-015		1901	2D2	2D	
624	Meridian Avenue	5315-012-028		1912	2D2	2D	
625	Meridian Avenue	5315-016-021		1913	2D2	2D	
631	Meridian Avenue	5315-016-045		1906	2D2	2D	
637	Meridian Avenue	5315-016-011		1924	2D2	2D	

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

NO	STREET	APN	NAME	DATE	HRI STATUS CODE	CITY INVENTORY STATUS CODE	DEIR STATUS CODE
708	Meridian Avenue	5315-013-040		1905	2D2	2D	
712	Meridian Avenue	5315-013-039		1910	2D2	2D	
716	Meridian Avenue	5315-013-038		1910	2D2	2D	
726	Meridian Avenue	5315-013-906		1920	2D2	2D	
806	Meridian Avenue	5315-014-023		1905	2D2	2D	
921	Meridian Avenue	5314-022-005		1912	2S2	5D1	
1011	Meridian Avenue	5315-015-024		1910	2D2	2D	
1015	Meridian Avenue	5315-015-023		1926	3D	2D	
1020	Meridian Avenue	5315-006-021		1901	2D2	2D	
1023	Meridian Avenue	5315-015-033		1906	2D2	2D	
1100	Meridian Avenue	5315-006-024		1906	2D2	2D	
1105	Meridian Avenue	5315-015-035		1903	2D2	2D	
1106	Meridian Avenue	5315-006-028		1905	2D2	2D	
1109	Meridian Avenue	5315-015-036		1924	2D2	2D	
1110	Meridian Avenue	5315-006-029		1908	2D2	2D	
1113	Meridian Avenue	5315-015-037		1907	2D2	2D	
1114	Meridian Avenue	5315-006-032		1920	2D2	2D	
1119	Meridian Avenue	5315-015-046		1907	2D2	2D	
1120	Meridian Avenue	5315-006-034		1911	2D2	2D	
1121	Meridian Avenue	5315-015-038		1907	2D2	2D	
1122	Meridian Avenue	5315-006-045		1909	2D2	2D	
1125	Meridian Avenue	5315-015-039		1915	2D2	2D	

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

NO	STREET	APN	NAME	DATE	HRI STATUS CODE	CITY INVENTORY STATUS CODE	DEIR STATUS CODE
1130	Meridian Avenue	5315-006-044		1924	2D2	2D	
1131	Meridian Avenue	5315-015-040		1914	2D2	2D	
1133	Meridian Avenue	5315-015-041		1908	2D2	2D	
1134	Meridian Avenue	5315-006-043		1909	2D2	2D	
1138	Meridian Avenue	5315-006-042		1910	2D2	2D	
1142	Meridian Avenue	5315-006-041		1910	2D2	2D	
1146	Meridian Avenue	5315-006-040		1914	2D2	2D	
1001	Mission Street	5315-008-024	Alexander Block	1904	1D	1	
1002	Mission Street	5315-014-049	Shapiro Block	1915	1D	1	
1012	Mission Street	5315-014-028	Ashton Block	1908	1D	1	
1014	Mission Street	5315-014-029	Mission Antiques	1924	1D	1	
921	Monterey Road	5314-022-005	Kenneth W. Joy House	1912	2S2	2S	2S2

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

APPENDIX D: INDIVIDUALLY ELIGIBLE PROPERTIES IN THE PHASE I SURVEY AREA (IDENTIFIED BY HRG)

NO	STREET	APN	LOCATED IN DISTRICT?	DATE	CITY INVENTORY STATUS CODE	DEIR STATUS CODE	2015 HRG STATUS CODE
2043	Alpha Avenue	5310-016-024	Valley View Heights Historic District	1919	5D1	6Y, 6Z	6Z, 6Z, 5S3
2046	Alpha Avenue	5310-017-010	Valley View Heights Historic District	1912	5D1	6Y, 6L 6Z	6Z, 6Z, 5S3
1000	Buena Vista Street	5317-008-004	Buena Vista-Prospect Historic District Addition	1903			6Z, 6Z, 6L
1030	Buena Vista Street	5317-008-001	Buena Vista-Prospect Historic District Addition	1936	4X	2S2	6Z, 6Z, 6L
1109	Buena Vista Street	5317-010-036	Buena Vista-Prospect Historic District Addition	1914	4X	2S2	6Z, 6Z, 6L
1133	Buena Vista Street	5317-010-037	Buena Vista-Prospect Historic District Addition	1912			6Z, 6Z, 6L
2003	Cambridge Place	5310-018-020	Valley View Heights Historic District	1912	5D1		6Z, 6Z, 5S3
1001	Columbia Street	5317-007-012	Buena Vista-Prospect Historic District Addition	1931			6Z, 6Z, 6L
1108	Diamond Avenue	5315-006-055	Library Neighborhood Historic District	1907	5D1		3B, 3CB, 5B
1136	Diamond Avenue	5315-006-048	Library Neighborhood Historic District	1911	5D1		3B, 3CB, 5B
1301	Diamond Avenue	5319-029-025	El Cerrito Circle Historic District	1927	4X		3D, 3CD, 5D3
1332	El Cerrito Circle	5319-029-022	El Cerrito Circle Historic District	1927	4X		3B, 3CB, 5B
1103	Fairview Avenue	5315-006-065	Library Neighborhood Historic District	1906	5D1		3B, 3CB, 5B
1133	Fairview Avenue	5315-006-058	Library Neighborhood Historic District	1965			6Z, 6Z, 5S3
221	Fremont Avenue	5317-012-030	Buena Vista-Prospect Historic District Addition	1908			6Z, 6Z, 6L
710	Fremont Avenue	5315-002-014	North of Mission Addition Historic District	1915			6Z, 6Z, 5S3
1104	Fremont Avenue	5315-004-036	Library Neighborhood Historic District	1904	5D1		3B, 3CB, 5B
1132	Fremont Avenue	5315-004-029	Library Neighborhood Historic District	1928	5D1		3B, 3CB, 5B
1732	Gillette Crescent Street	5310-031-022	Gillette Crescent Historic District	1923		6Y, 6Z	3D, 3CD, 5D3
1020	Highland Street	5317-008-014	Buena Vista-Prospect Historic District Addition	1927			6Z, 6Z, 6L
820	Kendall Avenue	5310-018-012	Valley View Heights Historic District	1910	5D1		6Z, 6Z, 5S3

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey

Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

NO	STREET	APN	LOCATED IN DISTRICT?	DATE	CITY INVENTORY STATUS CODE	DEIR STATUS CODE	2015 HRG STATUS CODE
2057	Meridian Avenue	5310-019-005	Valley View Heights Historic District	1917	SD1		6Z, 6Z, 5S3
904	Monterey Road	5315-015-030		1885	5S3	6Y, 6L, 6Z	6Z, 6Z, 5S3
603	Mound Avenue	5315-001-048	North of Mission Addition Historic District	1913			6Z, 6Z, 5S3
712	Mound Avenue	5315-002-062	North of Mission Addition Historic District	1895	SD1		6Z, 6Z, 5S3
920	Oliver Street	5317-006-009	Buena Vista-Prospect Historic District Addition	1935			6Z, 6Z, 6L
924	Oliver Street	5317-006-010	Buena Vista-Prospect Historic District Addition	1908			6Z, 6Z, 6L
930	Oliver Street	5317-006-011	Buena Vista-Prospect Historic District Addition	1912			6Z, 6Z, 6L
1126	Oxley Street	5315-007-029	Library Neighborhood Historic District	1906	SD1		3B, 3CB, 5B
1134	Oxley Street	5315-007-027	Library Neighborhood Historic District	1914	5B1		3B, 3CB, 5B
1144	Oxley Street	5315-007-024	Library Neighborhood Historic District	1908	SD1		3B, 3CB, 5B
1148	Oxley Street	5315-007-023	Library Neighborhood Historic District	1908	SD1		3D, 3CD, 5D3
1115	Windsor Place	5315-005-041	Library Neighborhood Historic District	1906	SD1		3B, 3CB, 5B
1141	Windsor Place	5315-005-047	Library Neighborhood Historic District	1911	SD1		3B, 3CB, 5B

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

APPENDIX E: ELIGIBLE HISTORIC DISTRICTS IN PHASE 1 SURVEY AREA (IDENTIFIED BY HRG)

DISTRICT NAME	DEIR STATUS CODE	2015 HRG STATUS CODE
El Cerrito Circle Historic District	2S2	3D
Gillette Crescent Historic District	6L	3D
Library Neighborhood Historic District	6Z	3D

APPENDIX F: PLANNING DISTRICTS IN PHASE 1 SURVEY AREA (IDENTIFIED BY HRG)

DISTRICT NAME	DEIR STATUS CODE	2015 HRG STATUS CODE
Buena Vista/Prospect Addition Historic District	6Z	6L
North of Mission Addition Historic District	6Z	6L
Valley View Heights Historic District	6L	6L

PUBLIC REVIEW DRAFT

City of South Pasadena: Historic Resources Survey Phase 1: SR 710 Area of Potential Effects

HISTORIC RESOURCES GROUP

This page intentionally left blank

A-12-1

Table 1.2 contains all of the state owned properties in the City of South Pasadena. Table 1.2 also contains the list of the 460 parcels. Many of the properties contain multiple residential or commercial units; for that reason, the table reaches up to 562.

A-12-2

Government Code Section 54237 sets forth the priorities for sales. A change would require legislation.

A-12-3

If the tunnel alternative is not selected as the preferred alternative, then the subsurface easement will expire.

A-12-4

Many of the properties contain multiple residential or commercial units; for that reason, Table 1.2 reaches up to 562. However, there are in fact only 460 properties. With regard to the comment about Table 2.1 in the environmental document, those numbers were based off of the SRIA located in appendix H in the environmental document. Page 6-7 of the SRIA clarifies how the numbers in Table 2.1 were determined. Any timeframes provided are estimates based on the most current information available. Caltrans is committed to selling the properties as soon as possible.

A-12-5

As summarized in Figure 1-3 and stated in section 4.2.1.5 in the environmental document, the current ASP regulations propose that the purchaser of a multifamily residence will rehabilitate and develop the property as limited equity cooperative housing or it will be used for low- and moderate-income rental or owner-occupied housing, with the present occupants afforded the first right of occupancy. If the proposed multifamily residence sale would result in displacements, it would be at the decision of the occupant.

A-12-6

The 64 single family residences that Caltrans listed in the SRIA are estimates used to analyze potential impacts of the sale. Please see comment responses A-12-4 and A-12-5.

A-12-7

Relocation Assistance will be provided as applicable under California Government Code sections 54235 through 54238.7, hereafter referred to as the "Roberti Act". The Roberti Act references specific sections of the California Government Code Relocation Assistance Law (relocation advisory assistance provided by section 7261; relocation benefits provided by paragraph (1) of subdivision (a) or subdivision (b) of section 7262; the payments authorized by subdivision (b) or (c) of section 7264; and the right for review of decision as provided by section 7266 if the person is forced to relocate from the dwelling, as a direct result of the State agency's disposal of the excess real property within 90 days of the recordation of the deed from the State agency to a new owner) to describe the relocation assistance provided for eligible displacees.

A-12-8

Caltrans has reviewed the June 25, 2015 update to the City of South Pasadena Historic Resources Survey and will make minor changes to the OHP status codes as a result. There are no other changes in the determinations of eligibility for the National Register or California Register.

Caltrans has the most updated list of the historical resource(s) within the Project Area limits that previously were listed or determined eligible for inclusion in the National Register of Historic Places, previously determined to meet California Register of Historical Resources eligibility criteria, and/or previously determined to be historical resource(s) for purposes of CEQA pursuant to PRC 15064.5(a) and the determinations are still valid.

A-12-9

Caltrans acknowledges the City's support to sell a historical resource with a protective covenant wherever feasible and to have the South Pasadena Housing authority be the custodian of the protective covenant.



OPPOSITION GROUPS (PARTIAL LIST)

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

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

LOS ANGELES NEIGHBORHOOD COUNCILS

Arroyo Seco
 Cypress Park
 Eagle Rock
 El Sereno
 Glassell Park
 Highland Park
 Lincoln Heights
 Sunland -Tujunga

GREEN SCISSORS 2011 REPORT GROUPS

Friends of the Earth
 Taxpayers for Common Sense
 The Heartland Institute
 Public Citizen

CONTACT INFORMATION

581 Garden Lane
 Pasadena, CA 91105
 no710extension@aol.com
 www.no710.com

CITIES

City of Glendale City of Sierra Madre
 City of Los Angeles City of South Pasadena
 City of La Canada Flintridge
 City of Pasadena

7 September 2015

Mr. Ron Kosinski, Deputy District Director
 Caltrans District 7
 Division of Environmental Planning
 100 South Main Street, MS – 16A
 Los Angeles, California 90012

RE: Comments on the DEIR for the SR-710 Surplus Property Sales

Dear Mr. Kosinski:

On behalf of the NO 710 Action Committee, I am submitting the following comments regarding the Draft Environmental Impact Report for SR-710 Surplus Property Sales, (DEIR/SPS) which was released by the California Department of Transportation in July 2015. We appreciate the opportunity to comment on the DEIR/SPS.

I hereby request that all of these comments be incorporated into the Administrative Record and receive full responses, as contemplated by CEQA.

The NO 710 Action Committee (NO 710 AC) was formed approximately five years ago. The organization includes members from the west San Gabriel Valley (La Canada-Flintridge, Pasadena, South Pasadena, Sierra Madre, Glendale, La Crescenta, San Marino, Alhambra), Los Angeles (Mt. Washington, Highland Park, Eagle Rock, El Sereno, East Los Angeles), and representatives from multiple Neighborhood Councils. We work in cooperation with numerous elected officials, mayors, city councils and their staff members. The NO 710 AC meets monthly. Our members are fully engaged in the SR 710

Project, attending public meetings, such as those for Scoping, Open Houses, Alternatives Analysis, Community Liaison Committee, TAC, and SOAC, Metro Board, CTC, San Gabriel Valley COG, SCAG, as well as informational forums and area City Council meetings. The NO 710 AC also submitted comments on the SR-710 North DEIR/DEIS released earlier this year.

Historic Resources – Built Environment

The DEIR/SPS fails to comply with CEQA because the document does not identify all historic resources along the proposed 710 Freeway right-of-way.

In East Los Angeles and El Sereno, the neighborhoods, commercial districts, open spaces and parks need to be surveyed and evaluated for historic resources, in cooperation with the City of Los Angeles Planning Department, the Los Angeles Conservancy, and the Office of Historic Preservation (OHP). For example, the neighborhoods near Berkshire Ave. and Sheffield Ave. may be eligible for listing on the National Register of Historic Places, the California Register, or for a local designation. Several years ago, Maycrest Court, a bungalow court in El Sereno, was determined to be eligible for listing on the National Register.

A-13-1

Caltrans-owned properties in South Pasadena and Pasadena have been surveyed in the past but need a careful review because additional properties have reached the 50-year mark. Additional properties may now be determined to be eligible for designation, particularly mid-century resources. The Planning Departments of South Pasadena and Pasadena and the historic preservation non-profit, Pasadena Heritage, should be involved in these reviews.

A-13-2

According to CEQA Guidelines, Caltrans must consider appropriate restoration and/or mitigation measures for these many cultural resources identified along the entire 710 Corridor.

A-13-3

Cultural Resources – Landscape

There is a lack of information in the DEIR/SPS regarding historic landscapes, gardens, open spaces and parks. Caltrans will need to provide an analysis of the past history and present conditions of these resources and to provide mitigation for the damage that has occurred during Caltrans' ownership.

The Storrier-Stearns Japanese Garden on Arlington Drive in Pasadena is listed on the National Register of Historic Places. A portion of the garden was taken by Caltrans and should be returned to the owners of the Storrier-Stearns Garden – *at no cost* - to the owners of the garden – so that the two landscaped areas can be joined as they were before Caltrans took ownership.

A-13-4

Caltrans also severely damaged the historic setting of the Pasadena Avenue Historic District, which has been determined eligible for the National Register. During the 1970s, Caltrans widened Pasadena Avenue and removed the concrete sidewalks and landscaped parkways. The old, healthy camphor trees, which lined Pasadena Avenue, were destroyed. The street, sidewalks and parkways should be restored and new camphor trees re-planted. These are just a few examples of the severe damage that has occurred to historic streets along the 710 Corridor.

A-13-5

Transfer of Caltrans-owned Land to existing Schools, Non-Profits & Cities

Scattered throughout the 710 Corridor are a number of schools, gardens, parks, and non-profits. Most of these properties have been maintained by the current renters or a non-profit organization and *have been maintained at the expense of the current tenants*. For example, the non-profit Ronald McDonald House has carefully restored its two historic homes. Sequoyah School has made significant capital improvements to its properties. Arlington Garden, once an empty weed-filled lot, has been beautified and become a treasured public park in southwest Pasadena. ALL of these improvements have been completed by the individual non-profits or schools – without any cost to Caltrans and all provide significant public benefits. These properties should be released – *without cost* – to the existing tenants.

A-13-6

Finding of No Adverse Effect (FONAE)

For some months, there have been discussions with Caltrans and the Office of Historic Preservation regarding the FONAE. There continues to be uncertainty about the outcome of these discussions, which has been reflected in comments submitted on the SR 710 North Freeway DEIR/DEIS (comment period having closed on 8 August 2015). The outcome of the FONAE discussions could have a significant impact on the sale of the properties.

A-13-7

Historic Preservation Covenants/Easements

This is another discussion still underway among the three communities, the Los Angeles Conservancy, and Pasadena Heritage. It is likely that each community will create its own workable approach to historic covenants/easements in cooperation with Caltrans.

In the DEIR/SPS, reference is made to the complications in connection with the sales of properties with historic covenants/easements. It should be noted that Pasadena Heritage already holds over 75 easements and has not experienced unusual problems with sales of properties with easements. The organization is prepared to work with Caltrans and to create an appropriate form of an easement for properties in Pasadena.

A-13-8

In the DEIR/SPS, there are references to ‘Caltrans retaining subsurface rights to a tunnel easement’ under the properties to be sold. This ‘option’ (pages s-3 and s-4) raises many questions and concerns. How many buyers are likely to consider a house with the potential of a very large tunnel to be constructed beneath the property? A buyer cannot be assured that there will be no damage to the property during or after the multi-year construction phases as well as the years following construction as the land ‘settles’. Will lenders be willing to be involved in such a risky and questionable loan?

A-13-9

Condition of Caltrans Properties

The DEIR/SPS does not provide information about the conditions of the 460 properties owned by Caltrans. No information is provided about mitigation measures to upgrade some or all of the residences, commercial buildings, or open spaces and parks.

Some of the questions are:

- Will some or all of the properties be sold ‘as is’ ?
- Will the residential properties be upgraded to meet local codes prior to sale?
- Can some properties that do not fall into the ‘affordable range’ be sold at market rate and will revenues from those sales be used to upgrade other homes in poor repair?
- Can all buyers be assured that heating and plumbing systems have been repaired and upgraded, as needed, and that the roof does not leak?

A-13-10

Prior to any sales, knowledgeable and licensed contractors must assess each property for code compliance and assess the conditions of sewers, plumbing, electricity, foundations, seismic bolting, masonry, roof and gutters. Signs of pests and termites should be investigated, too.

A-13-11

This information will be needed for the buyers to obtain a conventional loan. First-time homeowners, especially, will require assistance regarding the condition of the property they are buying and an understanding of the sales transaction.

The Sales Process – Lack of Understanding

At the recent Public Hearings sponsored by Caltrans, it became clear that existing tenants do not understand the sales process and are confused about the rules that govern the affordable sales program (ASP). There is no comprehensive description of ASP included in the DEIR nor is there clear and detailed information about who will qualify to purchase a property in the affordable range.

A-13-12

At the Public Hearing, many people spoke of their fears of being forced out of their homes because of the reference in the DEIR to 148 families who will be displaced. Yet, there was no substantive explanation as to how that number was determined. No one seems clear on what exact formula will be used for determining affordability – except

A-13-13

that the it must conform to the Roberti Bill and the California Streets and Highways Code. Caltrans must provide clear and understandable information to the tenants regarding the process to purchase their homes – either in the affordable ranges or at market-rate.

A-13-13

The appraisal process is of grave concern to the current tenants who are eligible to purchase their homes. It should be noted that Government Code, Section 54235 of the Roberti Law mandates Caltrans to reduce the displacement of families when surplus properties are offered for sale. How will the appraisal process work? It must be done in cooperation with local and experienced appraisers.

A-13-14

Another concern relates to the actual sales prices. It has been suggested that local realtors from each of the communities be involved in determining prices – depending on the condition of the property, of course, and its location.

A-13-15

Some Help for the Tenants

It is strongly suggested that Caltrans offer informational sessions for existing tenants - in each of the cities. The sessions should be informal, include translators, and provide clear information about the meaning of affordable, low-income, moderate income, and market-rate buyers. Experienced affordable housing professionals could explain who qualifies for affordable housing and under what circumstances. Caltrans should also sponsor educational sessions on lending procedures.

A-13-16

CEQA Section 21004 provides a strong message to Caltrans that it should use its discretionary power to minimize adverse environmental impacts, such as the displacement of families. The DEIR must analyze alternatives to avoid such a high number of displacements.

A-13-17

Appeals Board

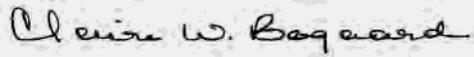
It is also suggested that Caltrans create an Appeals Board for existing tenants. Representative from local Housing Non-Profits could be invited to serve on the Appeals Board to assist the tenants with special challenges. The goal of the Appeals Board is to honor the Roberti Bill, and to assist as many long-term and qualified tenants as possible to purchase their homes and to avoid any tenant becoming homeless.

A-13-18

In conclusion, the NO 710 Action Committee welcomes the release of the properties currently owned by Caltrans along the 710 North Corridor. We believe that the return of these many neighborhoods, commercial areas, parks and open spaces will bring great benefits to the individual communities and to the State of California.

Again, we appreciate the opportunity to comment on the DEIR for Surplus Property Sales and we look forward to your responses.

Sincerely,



Claire W. Bogaard
NO 710 Action Committee
C/O 581 Garden Lane
Pasadena, California 91105
cwbogaard@earthlink.net

cc:

Carrie Bowen, Director of the California Department of Transportation, District 7
Malcolm Dougherty, Director of California Department of Transportation
Brian P. Kelly, Secretary of the California State Transportation Agency
Phillip Washington, CEO of Los Angeles County Metropolitan Transportation Authority
Terry Tornek, Mayor of Pasadena
Michael Beck, City Manager, Pasadena
Vince Bertoni, Director of Planning, Pasadena
Linda Dishman, Los Angeles Conservancy
Susan Mossman, Pasadena Heritage
Julianne Polanco, State Historic Preservation Officer

A-13-1

Caltrans has the most updated list of the historical resource(s) within the Project Area limits that previously were listed or determined eligible for inclusion in the National Register of Historic Places, previously determined to meet California Register of Historical Resources eligibility criteria, and/or previously determined to be historical resource(s) for purposes of CEQA pursuant to PRC 15064.5(a) and the determinations are still valid. The state-owned resources in the El Sereno neighborhood and the unincorporated areas of East Los Angeles have been subject to intensive survey by Caltrans in 2008 and re-evaluated in 2014. Caltrans consulted with Janet Hansen, Deputy Manager of the Los Angeles Office of Historic Resources, and manager of Survey LA in the fall of 2014. As a result of this consultation Caltrans received SHPO concurrence on the determinations of eligibility for these two areas in October 2014. The property known as Maycrest Bungalows was evaluated and determined not eligible for the National Register or California Register in September 2007, SHPO concurred in October 2007. The property was re-evaluated in 2008/2014 and again found not eligible for the National Register or California Register. The SHPO concurred with this determination in October 2014.

A-13-2

Please see response to A-13-1.

A-13-3

Caltrans is in compliance with CEQA guidelines

A-13-4

This comment request that the parcel on Arlington Drive be returned to the owners of the Storrier-Stearns Garden – at no cost - to then owners of the garden. Government Code section 54237 sets forth the priorities for sales. A change would require legislation. Unimproved leased property not sold to current tenants and vacant unimproved property will be offered for sale pursuant to Streets and Highways Code section 118.6 which allows properties to be offered at auction to the public, or by sale or exchange to public agencies.

A-13-5

This comment requests that Pasadena Avenue, sidewalks and parkways be restored and new camphor trees re-planted. Please see response to comment A-11-4

A-13-6

This comment request to transfer Caltrans-owned parcels to existing schools, non-profits and cities at no cost. Please see response to comment A-13-4.

A-13-7

As the SR-710 North Study is a separate regulatory process the SR-710 North Study Finding of No Adverse Effect (FONAE) has no influence on the SR-710 Surplus Property Sales.

A-13-8

Caltrans acknowledges that Pasadena Heritage is willing to work together in order to create covenants and easements with regard to historical resources. Caltrans is continuing consultation with Pasadena Heritage on a feasible method of protecting historic properties in Pasadena. Caltrans will develop a method of protection for historic properties for each community involved.

A-13-9

There has been much interest in purchasing a state owned property. Many current and former tenants and occupants have expressed interest in owning a property, with the knowledge that a tunnel may be built beneath the property.

Please refer to section 4.2.2.5 of the environmental document which includes the minimization measure R-1 that would be implemented to avoid and minimize the number of people displaced. Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. For those who are relocating and are eligible, Government Code Section 54238.3(b) (Appendix B) sets forth the relocation benefits and advisory assistance to be offered.

This comment deals with the SR-710 North Study. Information regarding vibration and settlement can be found at http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/

A-13-10

Fair market value will be determined by way of Caltrans-approved appraisals prepared in accordance with the Uniform Standards of Professional Appraisal Practice. Caltrans intends to have appraisal contracts in place with external licensed appraisers. Appraisers will contact the tenant to schedule a property inspection. Properties will be offered for purchase as soon as possible after completion of Caltrans approved appraisals.

Appraisals will be conducted on the existing "as is" condition of the property which takes into account any repairs required to make the property safe and habitable. The cost of these repairs is reflected in the appraised fair market value. For properties offered for sale at an affordable price, pursuant to Government Code Section 54237(b), Caltrans will provide repairs limited to the Minimum Property Standards and reasonable lender-required repairs.

A-13-11

Please see response to A-13-10

A-13-12

This comment states there is no description of ASP, however it is included in the DEIR as appendix F.

A-13-13

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The

displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties.

As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

With regard to the comment requesting information for tenants, the most current and up to date information regarding the Affordable Sales Program can be found at <http://www.dot.ca.gov/dist07/business/710sales/>.

A-13-14

Please see response to comment A-13-10

A-13-15

Please see response to comment A-13-10

A-13-16

Caltrans is currently exploring options to engage outside assistance with homebuyer education. Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790.

A-13-17

Caltrans in compliance with CEQA Section 21004 as the commenters request to be.

A-13-18

Please see response to comment A-13-16.



Ron Kosinski, Deputy District Director
Caltrans, District 7, Division of Environmental Planning
100 S. Main Street, MS 16A
Los Angeles, CA 90012

RE: SR-710 Surplus Property Sales Draft EIR

September 8th, 2015

Dear Mr. Kosinski,

After reviewing the SR-710 Surplus Property Sales Draft Environmental Impact Report (DEIR), Sequoyah School offers the following comments.

The school community will welcome the release of properties currently owned by Caltrans along the SR-710 corridor. We look forward to a day when properties are restored to private ownership and cultural resources are rehabilitated and conserved. It is with this in mind that we provide the following observations.

Description of Proposed Action:

It remains confusing to us precisely which properties will be released, and when they will be released, and therefore it is difficult to determine the scope of impacts.

It is clear that Caltrans holds the deed to 460 properties, but it is not clear whether all 460 properties will be eventually declared surplus. The DEIR refers to several contexts within which there would be a determination of surplus status and sales would take place. However, the DEIR also states that a determination for many properties is contingent on the outcome of the SR-710 North Study, which has not yet concluded.

The DEIR states: Streets and Highway Code Section 118 mandates that the agency sell properties it no longer needs for highway purposes. (S-3 DEIR) Those properties identified as being no longer necessary for project alternatives in the SR-710 North Study will be declared surplus. (S-3 DEIR) Sales will be planned in phases: properties that are within the scope of project alternatives would be treated differently than those located outside of the scope. (S.3 DEIR)

However, the DEIR never definitively discloses which residential or non-residential properties fall within the scope of each SR-710 North Study project alternative. Nor does it define how Caltrans might reach the conclusion that a property is no longer necessary for the project

A-14-1

A-14-2

alternatives in the SR-710 North Study. Caltrans does not identify which properties are assigned to each phase described in the process of determining the timing of eventual releases. It is also not clear whether phasing applies only to residential properties or if phasing also implicates non-residential properties. Additionally, it is unclear how the DEIR Alternatives 1 and 2 (S.4) will be informed by phasing.

A-14-2

The timing of potential sales is of critical importance to maintaining the character and cohesion of existing neighborhoods. Being able to sufficiently anticipate and plan for sales could affect whether a potential purchaser can afford to purchase their homes or maintain their business at their current locations.

A-14-3

Sequoyah School would appreciate further definition and clarification of the sales process.

Sequoyah has also reviewed and endorses, and incorporates by reference, the comments submitted by Pasadena Heritage.

Thank you for your consideration.

Sincerely,



Josh Brody

Director, Sequoyah School

A-14-1

This comment request clarification about the parcels impacted by the SR-710 North Study. As stated in S.3 Description of Proposed Action Area in the environmental document, three state owned parcels are within the scope of the SR-710 North Study.

A-14-2

This comment request information about the phasing of the sales. Government Code Section 54237(f) sets forth the priority for non-residential properties. The most current information regarding the process and the timelines can be found at <http://www.dot.ca.gov/dist07/business/710sales>, specifically question #4 in the Frequently Asked Questions. Any timeframes provided are estimates based on the most current information available. Caltrans is committed to selling the properties as soon as possible.

With the comment regarding how Caltrans defines a property is no longer necessary, Per Streets and Highways Code 118.6, ""Excess real property," for the purposes of this section, means all land and improvements situated outside of calculated highway right-of-way lines not needed or used for highway or other public purposes, including, but not limited to, those leased to public agencies pursuant to Section 104.15, and available for sale or exchange."

A-14-3

This comment request further clarification on the ASP process. Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790.

LUGETTA DUNN, Chair
BOB ALVARADO, Vice Chair
DARIUS ASSEMI
YVONNE B. BURKE
JAMES EARP
DARIO FROMMER
JAMES C. GHIEMMETTI
CARL GUARDINO
FRAN INMAN
JAMES MADAFFER
JOSEPH TAVAGLIONE

STATE OF CALIFORNIA

EDMUND G. BROWN Jr., Governor



SENATOR JIM BEALL, Ex Officio
ASSEMBLY MEMBER JIM FRAZIER, Ex Officio

Will Kempton, Executive Director

CALIFORNIA TRANSPORTATION COMMISSION

1120 N STREET, MS-52
SACRAMENTO, CA 95814
P. O. BOX 942873
SACRAMENTO, CA 94273-0001
FAX (916) 653-2134
(916) 654-4245
<http://www.catc.ca.gov>

August 27, 2015

Mr. Ron Kosinski *RK*
Deputy District Director
California Department of Transportation, District 7
Division of Environmental Planning
100 S Main Street MS 16A
Los Angeles, CA 90012

RE: Draft Environmental Impact Report: SR-710 Surplus Property Sales

Dear Mr. Kosinski,

The California Transportation Commission (Commission), as a Responsible Agency, received on August 6, 2015, the California Department of Transportation (Department) prepared Los Angeles SR-710 Surplus Property Sales Draft Environmental Impact Report (DEIR). The Department prepared the DEIR to environmentally clear the sale of surplus highway properties that are no longer needed for the construction of the surface freeway proposal, commonly referred to as the SR-710 Gap Closure Project.

Streets and Highways Code (S&HC) Section 118.6 requires the Department to adopt rules and regulations to determine which real property (land and improvements) outside of calculated right-of-way lines is no longer needed for highway purposes. Further, Section 118.6 requires the Department to the greatest extent possible to sell real property within one year from the date the Department determines the property to be excess. S&HC Section 118(a) allows the Department to sell real property or interest therein in the manner and upon terms, standards, and conditions established by the Commission. S&HC Section 118(b) requires that any conveyance of highway property shall be approved by the Commission. In addition, Government Code Section 54235 – 54238.7 (Roberti Law) allows for sale of surplus residential SR-710 properties at less than fair market value to persons and families of low or moderate income to mitigate the environmental effects, within the meaning of Article XIX, of the California Constitution, caused by highway activities.

In 2007, the Los Angeles County Superior Court in Case No BC 331628 (City of South Pasadena v. The California Department of Transportation) determined that legal title to SR-710 real residential property parcels shall remain vested in the Department until appropriate regulation for the disposal of the parcels under the Administrative Procedure Act pursuant to the Roberti Law are adopted. The Department is in the process of adopting the said appropriate disposal regulation.

The Commission has no comments with respect to the DEIR's purpose and need, the alternatives studied, and the evaluation methods used. Please be aware that if actions under the purview of the Commission are anticipated, notification should be provided to the Commission. Fund allocations, new public road connections, route adoptions and surplus property conveyances require Commission action.

A-15-1

If you have any questions, please contact the Commission's Deputy Director/Chief Engineer Stephen Maller at (916) 653-2070.

Sincerely,



WILL KEMPTON
Executive Director

c: Katrina Pierce, Chief, Caltrans Division of Environmental Analysis

A-15-1

This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

LAW OFFICE OF
CHRISTOPHER SUTTON
586 LA LOMA ROAD
PASADENA, CALIFORNIA 91105-2443
TELEPHONE (626) 683-2500 ... FACSIMILE (626) 405-9843
email: christophersutton.law@gmail.com

Friday, August 14, 2015
sent by fax to (916) 654-6378
and emailed: AffordableSales_Program @dot.ca.gov

Kimberly Erickson
ATTN: Affordable Sales Program
California Department of Transportation
1120 N Street, MS 37
Sacramento, California A 95814

RE: Revised Affordable Sale Program Regulations Issued on July 1, 2015;
Regulations Still Violate of Streets & Highways Code § 118.6, APA, & CEQA

Dear Ms. Erickson:

This letter is sent as comments on the Affordable Sales Regulations ("ASP") on behalf of myself, John Kvammen, and other members of **Caltrans Tenants of the 710 Corridor**. My prior comments on the earlier drafts of the ASP regulations remain applicable to the most recent draft. My prior comments were submitted on the following dates:

July 31, 2014	(letter of 5 pages)
August 26, 2014	(letter & attachments of 10 pages)
August 27, 2014	(letter & attachments of 17 pages)
September 2, 2014	(email, letter & exhibits of 69 pages)
February 10, 2015	(email of 2 pages, but Caltrans omitted a 1-26-2015 letter by Caltrans from the copy of my comment posted by Caltrans – a copy that letter is Attachment 1 hereto)
April 13, 2015	(email & letter of 4 pages)

I also testified orally at the public comment hearings on the ASP held on:

April 20, 2015	(comments on one Reporter's Transcript)
April 21, 2015	(comments on one Reporter's Transcript)
May 12, 2015.	(comments on two different Reporters' Transcripts)

I was **prevented by Caltrans staff from speaking** a second time at the two hearings on April 20 and April 21, 2015. Caltrans staff stated to me that Caltrans has a policy of "one speaker" per hearing, **regardless of the time available**. This policy was applied to me and to many other persons. We were prevented from speaking even though there were no other "first time" speakers waiting to speak. At least 45 minutes remained at each of the hearings, while Caltrans staff, consultants, and Court Reporters stood or sat in silence, and

Kimberly Erickson
California Department of Transportation
RE: Revised Affordable Sales Regulations ("ASP")

Friday, August 14, 2015
page 2 of 3

the whole audience also sat in silence. These were arbitrary, irrational, and almost surreal events. Caltrans imposed this unfair rule at all three APA hearings. It is an irrational policy that saves no money, but merely prevents persons from speaking a second time and offering new or different comments.

In preventing people from speaking at these hearings, Caltrans violated the APA and the rights of those persons seeking to speak a second time. Because these draft ASP regulations, when finalized, will result in the displacement of about 148 families now living in Caltrans residential units, Caltrans' arbitrary and irrational policy violated free speech, due process, equal protection guarantees, right to petition for redress, and right to defend your home and property contained in the California Constitution at Article One, sections 1, 2, 3, and 7, and also found in the Fourth, Fifth, and Fourteenth Amendments to the United States Constitution. Caltrans thus actively prevented comments from being submitted, and Caltrans will not hear or consider the comments of the people prevented from speaking. Caltrans "first speakers only" ad-hoc policy could also result in 148 families being deprived of their homes and vested property rights in existing tenancies without being afforded the due process provided by the APA. This rule was never formally adopted and violates APA.

A-16-1

At the public comment hearing on May 12, 2015, I was also prevented from speaking second time at the open microphone while everyone stood or sat in silence for one hour; the last half of the hearing. But I was able to deliver some of my longer comments to the "confidential" Court Reporter at the back of the room, Kristina Kae Berg, and those comments appear in the second transcript of that hearing. However, when Caltrans staff found out that I was

I have also submitted written comments on the **DRAFT ENVIRONMENTAL IMPACT STATEMENT ("ASP-DEIR")** released by Caltrans and related to the environmental impacts of the Affordable Sale Regulations. For unknown reasons the review process under the Administrative Procedures Act ("APA") and the California Environmental Quality Act ("CEQA") are being conducted by Caltrans on **two entirely separate tracks**, with entirely different Caltrans personnel and different Caltrans consultants. Caltrans' policy to separate the documents and public comments under APA and CEQA processes is wasteful for resources and prevent an integration of the two analyses. I hereby incorporate into this letter the entire ASP-DEIR and all written comments and oral testimony submitted on the ASP-DEIR at the hearings on August 6, 2015, and August 10, 2015.

A-16-2

The APA and CEQA Comment Processes Should Be Linked and Held Concurrently

Caltrans has improperly segregated the APA review of the draft ASP Regulations from the CEQA review of the environmental impact of the ASP Regulations. This segregation violates both the APA and CEQA by disconnecting two decision-making processes.

Kimberly Erickson
California Department of Transportation
RE: Revised Affordable Sales Regulations ("ASP")

Friday, August 14, 2015
page 3 of 3

The Draft Relocation Impact Report ("DRIR") Shows that the Roberti Law is Violated by these Proposed ASP Regulations: The ASP Regulations Displace 148 Families!

One of the stated goals of the Roberti is to prevent displacement of families and to preserve community integrity. See Government Code §§ 54235 and 54238.4. The DRIR (**Attachment 2 hereto**) shows that these regulations as written will displace 148 families. This is contrary to the goals and text of the Roberti Law, which has the goals of both providing housing and preventing displacement. The draft regulations fail to prevent displacement. See my comments to the ASP Regulations DEIR (**Attachment 3 hereto**)

A-16-3

Sincerely,



Christopher Sutton
Attorney for Caltrans Tenants of the 710 Corridor
and several individual tenant families

Three Attachments (21 pages) are incorporated into this letter by this reference:

1. 01-26-2016 Caltrans Letter (Ewing-Toledo) to Pasadena Heritage w/ hist. property list
2. Draft Relocation Impact Report by Caltrans (DRIR)
3. Chris Sutton emailed comments on ASP-DEIR

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, Division of Environmental Planning
100 South Main Street, MS-16A
LOS ANGELES, CA 90012-3606
PHONE (213) 897-9016
TTY (213) 897-4937



Serious drought.
Help save water!

January 26, 2015

Pasadena Heritage
651 South Saint John Avenue
Pasadena, CA 91105-2913
Attn: Susan N. Mossman, Executive Director

Subject: Historic Outreach for SR-710 Surplus Property Sale Project, Los Angeles County, California

Dear Ms. Mossman:

As you know, the California Department of Transportation (Caltrans) is proposing to sell the surplus properties originally purchased for a surface freeway project on State Route 710, between the I-10/SR710 Interchange and the I-210/SR134 Interchange, in the cities of Pasadena, South Pasadena and Los Angeles.

This action will be the subject of an Environmental Impact Report currently in preparation. As a state agency that owns historical resources within the project area we are also subject to Public Resources Code 5024 and 5024.5.

The California State Legislature enacted Public Resources Code 5024 and 5024.5 as part of a larger effort to establish a state program to preserve historical resources. These sections of the code require state agencies to take a number of actions to ensure preservation of state-owned historical resources under their jurisdiction. With relation to PRC 5024 and 5024.5, historical resources are defined as those listed or eligible for listing in the National Register or as a California Landmark. Under PRC 5024(f) and 5024.5, state agencies must provide notification and submit documentation to the State Historic Preservation Officer (SHPO) for any project having the potential to affect state-owned historical resources, and to request the SHPO's comments on the project.

At this time we are soliciting any written comments you may have regarding the sale of the state-owned historic resources in your community (see attached list). It is our intent to prepare and record Historic Covenant and Notice of Restrictions for the subject historic resources to preserve their historic status. We ask that you submit your comments to the above address within 15 days of receiving this letter. If you have any questions, please contact me at Kelly.ewing-toledo@dot.ca.gov.

Sincerely,


Kelly Ewing-Toledo
Historic Resources Coordinator
Caltrans Division of Environmental Planning
District 7, Los Angeles

"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"

ATTACHMENT #1

City of Pasadena NUMBER	STREET	DESCRIPTION	STATUS
216	ARLINGTON DR.	Pasadena Avenue Historic District	
180	ARLINGTON DR.	Pasadena Avenue Historic District	
181	ARLINGTON DR.	Pasadena Avenue Historic District	
169	ARLINGTON W. DR.	Pasadena Avenue Historic District	
235	BELLEFONTAINE ST.	Markham Place Historic District	
203	BELLEFONTAINE ST.	Markham Place Historic District	
206-216	CALIFORNIA BLVD. W.	Markham Place Historic District	Individually eligible property
202-204	CALIFORNIA BLVD. W.	Markham Place Historic District	
190 (595 S. Pasadena Ave)	CALIFORNIA BLVD. W.	Markham Place Historic District	Individually eligible property
231	COLUMBIA ST.	Pasadena Avenue Historic District	
181	COLUMBIA ST.	Pasadena Avenue Historic District	
177	GLENARM ST.	Pasadena Avenue Historic District	
185	GLENARM ST.	Pasadena Avenue Historic District	
165	HURLBUT ST.	Pasadena Avenue Historic District	
177	HURLBUT ST.	Pasadena Avenue Historic District	
218	MADLINE DR.	Pasadena Avenue Historic District	
205	MADLINE DR.	Pasadena Avenue Historic District	
230	MADLINE DR.	Pasadena Avenue Historic District	
202	MADLINE DR.	Pasadena Avenue Historic District	
215	MADLINE DR.	Pasadena Avenue Historic District	
225	MADLINE DR.	Pasadena Avenue Historic District	
535	S. PASADENA AVE.	Markham Place Historic District	1 building (Parsonage) is district contributor. 3 Mid-Century buildings non-contributors but Individually eligible properties
1190	S. PASADENA AVE.	Pasadena Avenue Historic District	
1207	S. PASADENA AVE.		Not a district contributor, Individually eligible property
1199	S. PASADENA AVE.	Pasadena Avenue Historic District	Individually eligible property
1191	S. PASADENA AVE.	Pasadena Avenue Historic District	
1200	S. PASADENA AVE.	Pasadena Avenue Historic District	Individually eligible property
1150	S. PASADENA AVE.	Pasadena Avenue Historic District	
1140-1142	S. PASADENA AVE.	Pasadena Avenue Historic District	
1120	S. PASADENA AVE.	Pasadena Avenue Historic District	
1112	S. PASADENA AVE.	Pasadena Avenue Historic District	Individually eligible property
1100	S. PASADENA AVE.	Pasadena Avenue Historic District	
1090	S. PASADENA AVE.	Pasadena Avenue Historic District	
1080	S. PASADENA AVE.	Pasadena Avenue Historic District	
1059	S. PASADENA AVE.	Pasadena Avenue Historic District	
1051	S. PASADENA AVE.	Pasadena Avenue Historic District	Individually eligible property
1041	S. PASADENA AVE.	Pasadena Avenue Historic District	Individually eligible property
1030	S. PASADENA AVE.	Pasadena Avenue Historic District	Individually eligible property

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

1000	S. PASADENA AVE.	Pasadena Avenue Historic District	Individually eligible property
900	S. PASADENA AVE.	Pasadena Avenue Historic District	Individually eligible property
888	S. PASADENA AVE.	Pasadena Avenue Historic District	
876	S. PASADENA AVE.	Pasadena Avenue Historic District	
866	S. PASADENA AVE.	Pasadena Avenue Historic District	Individually eligible property
779	S. PASADENA AVE.	Markham Place Historic District	Individually eligible property
765	S. PASADENA AVE.	Markham Place Historic District	Individually eligible property
763	S. PASADENA AVE.	Markham Place Historic District	Individually eligible property
737	S. PASADENA AVE.	Markham Place Historic District	
894	S. PASADENA AVE.	Pasadena Avenue Historic District	
801	S. PASADENA AVE.	Markham Place Historic District	Individually eligible property
703	S. PASADENA AVE.	Markham Place Historic District	
679	S. PASADENA AVE.	Markham Place Historic District	Individually eligible property
696	S. ST. JOHN AVE.	Markham Place Historic District	Individually eligible property
762	S. ST. JOHN AVE.	Markham Place Historic District	
734	S. ST. JOHN AVE.	Markham Place Historic District	
726	S. ST. JOHN AVE.	Markham Place Historic District	
714	S. ST. JOHN AVE.	Markham Place Historic District	
678	S. ST. JOHN AVE.	Markham Place Historic District	
650	S. ST. JOHN AVE.	Markham Place Historic District	
646	S. ST. JOHN AVE.	Markham Place Historic District	
640	S. ST. JOHN AVE.	Markham Place Historic District	
628	S. ST. JOHN AVE.	Markham Place Historic District	
620	S. ST. JOHN AVE.	Markham Place Historic District	
602	S. ST. JOHN AVE.	Markham Place Historic District	
600	S. ST. JOHN AVE.	Markham Place Historic District	
584	S. ST. JOHN AVE.	Markham Place Historic District	
670	S. ST. JOHN AVE.	Markham Place Historic District	
224 & 232	W. STATE ST.	Pasadena Avenue Historic District	Individually eligible property
214	W. STATE ST.	Pasadena Avenue Historic District	
180	W. STATE ST.	Pasadena Avenue Historic District	Individually eligible property
214	W. STATE ST.	Pasadena Avenue Historic District	
225	W. STATE ST.	Pasadena Avenue Historic District	
237	W. STATE ST.	Pasadena Avenue Historic District	
245	WIGMORE DR.	Pasadena Avenue Historic District	
230	WIGMORE DR.	Pasadena Avenue Historic District	
212	WIGMORE DR.	Pasadena Avenue Historic District	
231	WIGMORE DR.	Pasadena Avenue Historic District	
215	WIGMORE DR.	Pasadena Avenue Historic District	

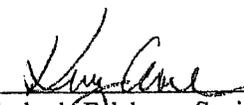
State of California
Department of Transportation
DRAFT RELOCATION IMPACT REPORT

Surplus Property Sales
Los Angeles/Pasadena/South Pasadena
710 Property Sales
07-LA-710- 27.5/32.2- 0700000063

SUMMARY OF RELOCATION IMPACT REPORT:

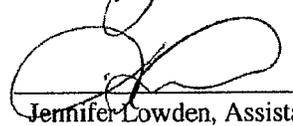
It is estimated that this project will displace a total of 148 occupant households from the neighborhood of El Sereno within the city of Los Angeles, and the cities of Pasadena and South Pasadena. There is sufficient housing stock within the greater replacement area for displacees with similar amenities, access to transportation, utilities, schools, and public services to the displacement areas. Finding affordable replacement housing will present a challenge, requiring a high degree of advisory assistance and cooperation/consultation with agencies such as Housing and Urban Development, when necessary. Occupants who become homebuyers will not be displaced. To increase the potential for occupants to obtain financing to purchase, assistance from other agencies (such as California Housing Finance Agency) will be sought to make more financing products available to prospective buyers than are readily available in the general lending market. This project is anticipated to take a full five years from declaration of the first occupied residential parcel as surplus, to transfer of the last property. To administer the relocation program as proposed, district staff workload is anticipated to increase by 4 PYs (Person Years) for the duration of the project.

The undersigned has completed this report of the above-referenced project and recommends approval of the report.



Kimberly Erickson, Senior Right of Way Agent

The undersigned has reviewed and approved this report.



Jennifer Lowden, Assistant Division Chief
Headquarters Right of Way and Land Surveys

Distribution: Original File

c: Region/District R/W Manager
Region/District R/W Branch Managers
Branch-Design

Project Manager
Environmental Planning

Attachments:
Attachment A- Project Map/Displacement Area Map
Attachment B- Replacement Area Map
Attachment C- Comparative Data

ATTACHMENT #2

SUMMARY AND PROJECT DATA**A. Purpose of Study:**

The purpose of this study is to provide the Department of Transportation, local agencies and the public with information as to what effect a proposed surplus property sales project would have on the residential and nonresidential occupants within the proposed project area. Specifically, this report is concerned with potential problems that may be caused by the displacement of those currently occupying surplus property.

B. Limits and Purpose of Project:

Streets and Highways Code section 118.6 states that the California Department of Transportation (Caltrans) to the greatest extent possible, will offer to sell or exchange property that has been determined by Caltrans to be excess to their needs. Government Code sections 54235 through 54238.7 known as the Roberti Act, as amended by Senate Bill 416 in 2013, includes priorities for disposal of residential properties originally acquired for the State Route 710 (SR-710) extension in the cities of Los Angeles, South Pasadena, and Pasadena and includes requirements that the agency impose terms, conditions, and restrictions to ensure that housing remain available for low or moderate income households. Upon formally adopting Affordable Sales Program regulations, Caltrans intends to meet the goal of the legislature to dispose of surplus properties originally acquired for the SR-710 extension while preserving and expanding the availability of low and moderate income housing.

C. General Description of Properties:

In the northern State Route 710 project area, Caltrans currently holds title to 460 properties originally acquired for the SR-710 extension project. They include single-family residential properties, multi-family properties (ranging from duplexes to small apartment buildings), and commercial/industrial and unimproved properties. Of these properties, there are approximately 312 occupied single-family residences, 45 vacant single-family residences, and 41 occupied multi-family units. The remaining properties consist of unoccupied residential, commercial/industrial, vacant land, and special use properties.

D. Basis of Findings:

The sources used in the preparation of this report were both primary and secondary in nature, and are identified in *Sources* and in Attachment C.

E. Describe the Displacement Area:

The displacement area includes properties along the SR-710 from Alhambra's Valley Boulevard to the Foothill Freeway (I-210) in Pasadena at California Boulevard. Affected properties are in the neighborhood of El Sereno, the City of Pasadena, and the City of South Pasadena.

El Sereno

El Sereno is the easternmost neighborhood in the City of Los Angeles. According to the official boundaries of the LA-32 Neighborhood Council, as certified by the City of Los Angeles DONE on May 21, 2002, it 4.9 square miles. The Los Angeles Times reports (per the 2000 US Census) that El Sereno has a population of 43,766, with a population density of 9,826 people per square mile. It is adjacent to the City of Alhambra to the east, the neighborhood of Lincoln Heights to the west, the neighborhoods of Arroyo Seco and Highland Park and the City of South Pasadena to the north, and the unincorporated communities of Boyle Heights and East Los Angeles to the south. It is bordered by I-10 to the south, I-710 to the east and is approximately 1 mile east of I-5.

Residential uses are the primary land uses in El Sereno, comprising approximately 52 percent of the land within the community, followed by public uses (15 percent). The neighborhood of El Sereno is primarily a built-out community, with opportunities for future development likely involving infill or the repurposing of land that is currently occupied by existing homes and businesses. There are five business districts in El Sereno, one City library in the neighborhood, eight places of worship and several schools serving the displacement area. There are no hospital facilities in El Sereno and the LAPD does not operate any police stations within El Sereno. The City of Los Angeles operates and maintains three parks, one community center, and two recreation centers in the neighborhood, and there are public transportation services provided by Metro, Foothill Transit, LADOT DASH, and Monterey Park Spirit Bus. Commuter rail service in the neighborhood is provided by Metrolink at the El Sereno Metrolink Station.

Elderly residents, who are 65 years and older, comprise a slightly smaller share of El Sereno than the County overall (10.5 percent versus 10.9 percent). Transit dependent residents comprise 34.9 percent of neighborhood residents, versus the County overall rate of 25.2 percent. Average household size in the neighborhood of El Sereno (3.58 persons) is slightly larger than the County overall (2.98 persons), while the median household income is lower than the County overall (\$44,368 versus \$56,266).

Pasadena

The City of Pasadena is 23.1 square miles, and located approximately ten miles northeast of Downtown Los Angeles. According to the 2010 US Census, Pasadena has a population of 137,122. Population density is estimated at 5,936 people per square mile. It is adjacent to the City of La Canada Flintridge and the unincorporated community of Altadena to the north, the Cities of Sierra Madre and Arcadia to the east, the Cities of South Pasadena and San Marino and the unincorporated communities of San Pasqual and East Pasadena to the south, and the Cities of Los Angeles and Glendale to the west. The city is located approximately 4 miles from the northern terminus of I-710. I-210 runs through the central part of Pasadena, SR 134 runs through western Pasadena, and SR110 passes through the southwest portion of the City as Arroyo Parkway.

Residential uses are the primary land uses in Pasadena, comprising approximately 57 percent of the land within the community, followed by public uses (17 percent). The City of Pasadena is primarily a built-out community, with opportunities for future development likely involving infill or the repurposing of land that is currently occupied by existing homes and businesses. There are seven main districts in Pasadena, five of which are within .5 miles of the displacement area. The Pasadena Central Library services the city with nine branches, four of which are within close proximity (.5 miles) to the displacement area. The Pasadena Police Station, Huntington Memorial Hospital, several places of worship and schools are within close proximity to the displacement area. A total of nineteen parks, community centers, and recreation centers are located in area, and public transportation services are provided by Metro, Foothill Transit, and the Pasadena ARTS. Metro operates six Gold Line light rail stations within Pasadena.

Elderly residents, who are 65 years and older, comprise a larger share of Pasadena than the County overall (13.5 percent versus 10.9 percent). Transit dependent residents comprise 20.1 percent of residents, versus the County overall rate of 25.2 percent. Average household size in the City of Pasadena (2.42 persons) is slightly smaller than the County overall (2.98 persons), while the median household income is higher than the County overall (\$67,920 versus \$56,266).

South Pasadena

The City of South Pasadena is approximately 3.4 square miles in size and located east of SR 110 and approximately 2 miles south of I-210. It is bordered by Pasadena to the north, the City of San Marino

to the east, the City of Los Angeles and Alhambra to the south, and the City of Los Angeles to the west. According to the 2010 US Census, South Pasadena has a population of 25,619. Population density is estimated at 7,535 people per square mile.

Residential uses are the primary land uses in South Pasadena, comprising approximately 79 percent of the land within the community, followed by commercial and service uses (7 percent). South Pasadena is primarily a built-out community, with opportunities for future development likely involving infill or the repurposing of land that is currently occupied by existing homes and businesses. There are three main business districts in the City of South Pasadena. The South Pasadena Public Library, the South Pasadena Police Station, four places of worship, and several schools are within .5 miles and service the displacement area. There are no hospital facilities in the City of South Pasadena.

Elderly residents, who are 65 years and older, comprise a slightly larger share of South Pasadena than the County overall (12.1 percent versus 10.9 percent). Transit dependent residents comprise a considerably smaller share of South Pasadena residents (8.4) versus the County overall rate of 25.2 percent. Average household size in the South Pasadena (2.43 persons) is slightly smaller than the County overall (2.98 persons), while the median household income is higher than the County overall (\$84,914) versus (\$56,266).

F. Estimated displacement units:

- This report assumes that all occupied parcels currently held by Caltrans for the SR-710 Extension Project will be sold.
- Currently, 175 of the 398 residential properties are rented at affordable rates.
- Caltrans will not subdivide ownership of multi-family residential properties. It is assumed that all 41 surplus multi-family properties and 45 vacant single-family residences will be acquired by housing entities. Housing entities are assumed to purchase an additional 64 single family residences for concurrent resale to current occupants. Proposed regulation requires housing entities to initially offer properties for either sale or rent to current tenants at fair market or affordable rents, based on income eligibility. Thus, it is estimated that current occupants of the multi-family properties and the 64 occupied single-family residences acquired by entities will not be displaced.
- It is further assumed that, of occupied residential properties not purchased by housing related entities (all single family residences), approximately 100 will be sold at affordable prices to current occupants. The remaining 148 single family properties will be sold at fair market value to non-occupants, thus resulting in 148 anticipated displaced households. The estimates used in this report are based on these assumptions.
- Nonresidential displacements are not anticipated. Proposed regulations require Caltrans to prioritize fair market offers of nonresidential parcels first to former owners, then to current tenants in good standing. Based on feedback during the rulemaking process for the Affordable Sales Program regulations and (lack of) inquiries made to Caltrans from former owners, it is anticipated that former owners of the nonresidential properties will not be interested.
- Alternatives are not explored in this Draft Relocation Impact Report, as the proposed rulemaking seeks to sell the maximum number of surplus properties originally acquired by Caltrans for the 710 Extension project.

Est. Displaced Single Family Residences: 148
Est. Displaced Multi-family Units: 0
Est. Displaced Nonresidential: 0

TOTAL DISPLACEMENTS: 148

G.	Adequate relocation resources exist for:	Yes	No
	Residential tenants	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Businesses	N/A	
	Nonprofit Organizations	N/A	
	Agriculture	N/A	

1. The replacement neighborhood studied is described as follows:

Like the displacement area, the replacement area includes a large geographic area including several neighborhoods and cities. Replacement neighborhoods are within 15 miles of all potential displacements associated with this project. See Attachment B.

2. The relocation areas are comparable in terms of amenities, public utilities, and accessibility to public services, transportation and shopping. Yes No

Each displacement city/neighborhood has varying amenities, access to public services, transportation, shopping, and other neighborhood characteristics. Similarly, the neighborhoods and cities within the greater relocation area possess varying characteristics. However; care was taken to ensure that within the relocation area identified there are several neighborhoods and cities with similar amenities to those of the respective cities/neighborhoods of displacement area.

3. There are not public projects in the area that will displace other families or make additional housing available concurrently with the subject project.

4. Last Resort Housing Program payments will not be utilized to relocate residential households being displaced. The purpose of this project is to meet the intended goal of the Legislature of preserving and expanding the availability of low and moderate income housing supply by disposing of real property previously acquired for the State Route 710 Extension project (pursuant to the "Roberti Act", Government Code section 54235). Relocation benefits and payments will be made pursuant to the Roberti Act.

5. There are special/significant relocation problems associated with this project. Proposed regulations to implement the Affordable Sales Program give priority to current occupants meeting eligibility criteria. Occupants who become homebuyers will not be displaced. To increase the potential for occupants to obtain financing to purchase, Caltrans is working with California Housing Finance Agency to make more financing products available to prospective buyers than are readily available in the general lending market. In anticipation of this sales project, homebuyers workshops have also been provided to interested tenants occupying properties that may be sold as surplus. Occupants who do not purchase will be provided advisory assistance to find and relocate to comparable housing, and Caltrans will seek assistance from agencies such as Housing and Urban Development to find affordable housing.

6. A field office will not be required for this project.

DETAILED ANALYSIS:

H. DISPLACEMENT AREA

A. Residential Displacements

Residential displacements include an estimated 148 single-family residences from the El Sereno neighborhood within the city of Los Angeles, the city of Pasadena, and the city of South Pasadena. Most residences were built between 1897-1976 and range in size from 562-6,830 square feet. There are several 2-3 bedroom/1bath properties in the 1,000-1,400 square foot range. Architectural styles, quality of condition and construction also vary widely among the displacement properties.

1. Average monthly rental rate for residential rental units owned by Caltrans within the displacement area: approximately \$1,085. As a result of the Affordable Rent Program implementation (regulations adopted January 2014), this figure is significantly lower than average fair market rent for the area.

B. Business and Nonprofit

It is anticipated that neither businesses, nor nonprofits, will be displaced by the property sales.

C. Agricultural Impact

No agricultural impact anticipated. With the exception of small urban farms and neighborhood gardens, there are no agricultural parcels within the scope of this project. Further, the proposed regulations require Caltrans to prioritize fair market offers of nonresidential parcels first to former owners, then to current tenants in good standing.

II. REPLACEMENT AREA

A. Describe in relationship to the local town/community and to the Displacement Area:

The displacement area comprises a large footprint, including one neighborhood and two cities of varying characteristics and amenities. Similarly, the replacement area identified for this project includes a large footprint adjacent to the project area, including several neighborhoods and cities with varying characteristics and amenities. The area encompasses portions of the San Gabriel Valley and Los Angeles County roughly outlined in Attachment B, with a specific focus on the cities of Alhambra, Altadena, Arcadia, Glendale, Monrovia, Monterey Park, San Gabriel, San Marino; those portions of El Sereno, Pasadena, and South Pasadena that are not within the displacement area; and Northeast Los Angeles which includes the neighborhoods of Atwater Village, Cypress Park, Eagle Rock, Glassell Park, Highland Park, Montecito Heights and Mount Washington.

1. Estimated housing stock (total housing units for sale and for rent on Attachment C, w/exception of figures specific to 90032 zip code to avoid double counting Northeast LA counts): 12,128 units; 7,979 for rent and 4,149 for sale
2. Vacancy rate expressed as a range: 3.3%-7.2%
3. Estimated median value and monthly rental rates of comparable, typical, single family homes that are DS&S within the replacement area.

Average median value for single family homes in El Sereno, Pasadena, and South Pasadena is \$639,367. Of all replacement areas identified, median value for the city of San Gabriel is most similar at \$654,900. Thus, San Gabriel was used as the most comparable area to survey single

family listings and rental rates. Values for single family residences between 1,000-1,400 square feet were used derive the median value of \$549,000; while single family residences between 2-3 bedrooms in San Gabriel were used to derive the monthly rental rate of \$2,100 for homes considered typical and comparable to the average displacement dwelling.

B. Business and Nonprofit Replacement:

1. Number of business sites that will be available for rent, purchase, or development:
N/A

D. Residential Replacement:

1. Replacement neighborhoods are homogeneous to those in the displacement area. (See Item II. A. above.)
2. General condition of displacement neighborhood: Average to Good.
3. Condition of units being displaced: Average.
4. Condition of units in replacement area. Average to Very Good.
5. Number of mobile home parks directly impacted by the project. None.

E. Comparative Data: see Attachment C

III. RELOCATION RESOURCES

- A. This project is anticipated to take a full five years from declaration of the first occupied residential parcel as surplus, to transfer of the last property. To administer the relocation program as proposed, district staff workload is anticipated to increase by 4 PYs (Person Years) for the duration of the project.
- B. Market availability is expected to remain adequate through the time of displacement. While Los Angeles County can be considered a scarce housing market, the life of this excess land sales project is projected for a full five years. Thus, the replacement market will not be flooded with an unmanageable number of displacees in need of replacement housing at once. In addition, there are no other public projects identified within the areas that will displace other families concurrently with the excess land sales project.

IV. HOUSING IMPACT

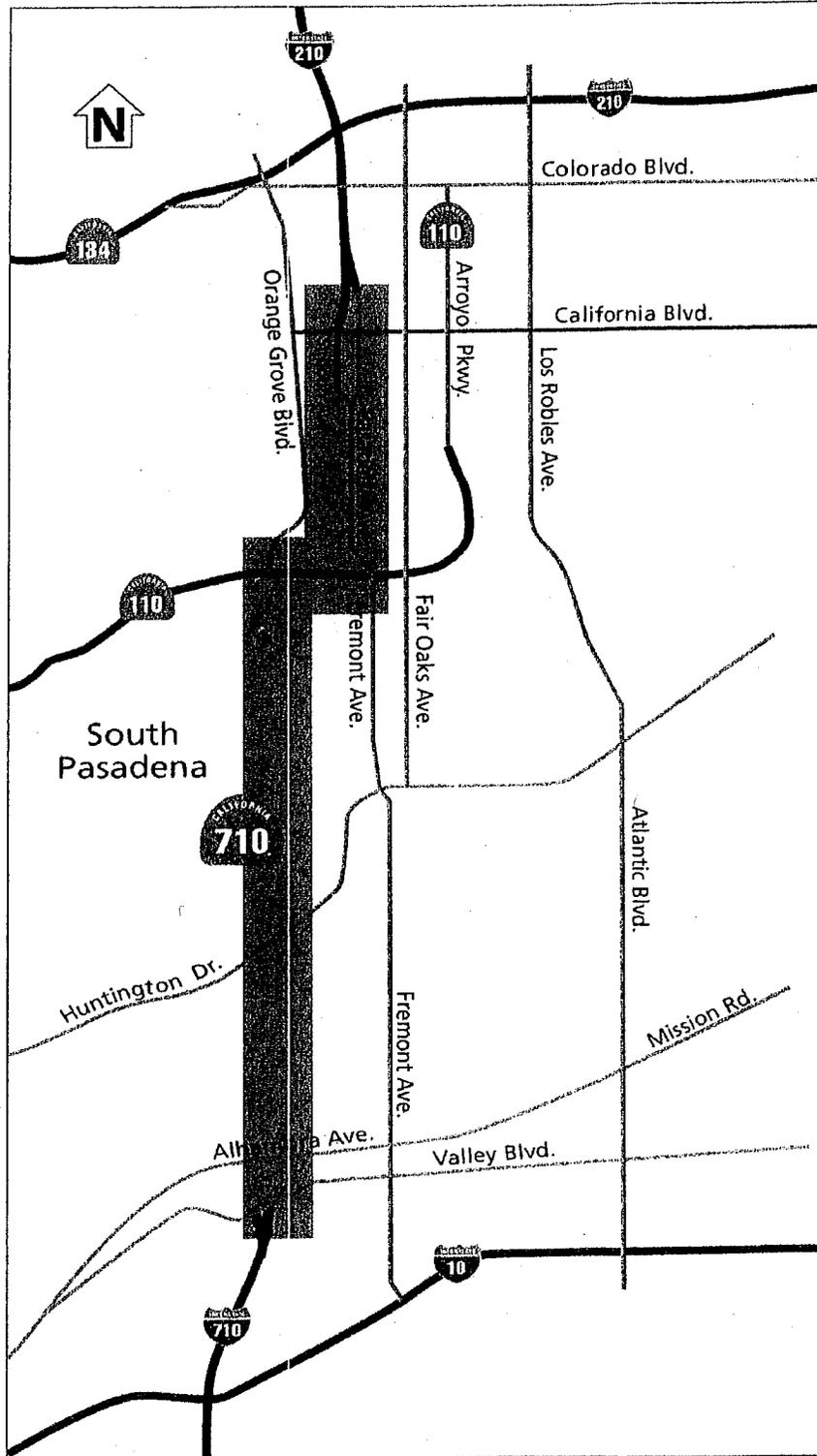
- A. This project will not significantly impact the local housing stock for the community as there are no plans for demolition (or conversion to nonresidential use) of the existing housing stock associated with this excess land sales project.

FINAL CONCLUSION: It is estimated that this project will displace a total of 148 occupant households from the neighborhood of El Sereno and the cities of Pasadena and South Pasadena. There is sufficient housing stock within the greater replacement area for displacees with similar amenities, access to transportation, utilities, schools, and public services to the displacement areas. Finding affordable replacement housing will present a challenge, requiring a high degree of advisory assistance and cooperation/consultation with agencies such as Housing and Urban Development, when necessary. Occupants who become homebuyers will not be displaced. To increase the potential for occupants to obtain financing to purchase, assistance from other agencies (such as California Housing Finance Agency) will be sought to make more financing products available to prospective buyers than are readily available in the general lending market.

This project is anticipated to take a full five years from declaration of the first occupied residential parcel as surplus, to transfer of the last property. To administer the relocation program as proposed, district staff workload is anticipated to increase by 4 PYs (Person Years) for the duration of the project.

**Sources: Area descriptions, housing, and community data from 710 North Study Community Impact Assessment, May 16, 2014
Assumptions and property data from Standardized Regulatory Impact Assessment Report Proposed Affordable Sales
Program Regulations, March 2015
Caltrans property types/descriptions/rates from Right of Way Property Management System, Jan. 27, 2015, March 24, 2015
General real estate market listing and rental rate information from Zillow and Trulia, March 2, 2015, March 25, 2015*

Attachment A- Displacement/Project Map



Attachment C- Comparative Data

	Displacement	Alhambra	Altadena (CDP)	Arcadia	Zip Code 90032, incl. El Sereno	Glendale	Pasadena
Total Housing Units	148	30,915	15,947	20,686	13,521	76,269	29,551
% Owner Occupied	-	40.8%	71.6%	63.1%	49%	38.1%	45%
% Renter Occupied	-	59.2%	28.4%	36.9%	51%	61.9%	55%
Total Housing Units Vacant	-	1,698	735	1,094	756	4,000	4,281
Vacancy Rate	-	5.5%	4.6%	5.3%	5.6%	5.2%	7.2%
Housing Units For Sale	-	162	99	138	91	358	580
Housing Units For Rent	-	972	224	519	329	2,585	2,158
Persons per Household	2.42-3.58 ⁱ	2.82	2.78	2.83	3.58	2.7	2.42
Median Housing Value	\$381,800- \$864,300 ⁱⁱ	\$551,500	\$661,400	\$1,107,400	\$381,800	\$675,900	\$672,000
Median Monthly Rent	Average approx \$1,085	\$2,321	\$2,605	\$3,031	\$1,985	\$2,733	\$2,578

Attachment C- Comparative Data (cont.)

	Monrovia	Monterey Park	Northeast Los Angeles	San Gabriel	San Marino	South Pasadena
Total Housing Units	14,473	20,850	158,820 ⁱⁱⁱ	13,237	4,477	11,118
% Owner Occupied	49.5%	55.4%	46% ^{iv}	49.2%	91.4%	45.7%
% Renter Occupied	50.5%	44.6%	54% ^v	50.8%	8.6%	54.3%
Total Housing Units Vacant	711	887	9,370 ^{vi}	695	147	651
Vacancy Rate	4.9%	4.3%	est 5.9% ^{vii}	5.3%	3.3%	5.9%
Housing Units For Sale	88	58	2,529 ^{viii}	64	21	52
Housing Units For Rent	358	382	Not available	387	26	368
Persons per Household	2.65	3.01	3.1	3.13	3.02	2.43
Median Housing Value	\$567,100	\$549,800	\$400,000 ^x	\$654,900	\$2,209,100	\$864,300
Median Monthly Rent	\$2,380	\$2,353	Not available	\$2,468	\$4,723	\$2,895

- Median Housing Values and rental rates from Zillow (accessed 3/2/15 and 3/22/15) unless otherwise specified
- Persons per household from 2010 Census unless otherwise specified

Attachment C- Comparative Data (cont.)

- Total housing units, vacancy rates/data, units for sale, units for rent, occupancy rates by type from 2010 census unless otherwise specified
- Limited information available for the region of Northeast Los Angeles, thus countywide statistics are applied to regional data in some cases (as specified)

ⁱ Range for El Sereno, Pasadena, South Pasadena

ⁱⁱ Range for El Sereno, Pasadena, and South Pasadena

ⁱⁱⁱ city-data.com/neighborhood/northeast-los-angeles-los-angeles-ca, accessed 3/2/15

^{iv} city-data.com/neighborhood/northeast-los-angeles-los-angeles-ca, accessed 3/2/15

^v city-data.com/neighborhood/northeast-los-angeles-los-angeles-ca, accessed 3/2/15

^{vi} derived by applying general LA County vacancy rate to Total Housing Units

^{vii} Rate for Los Angeles County, per 2010 Census

^{viii} Current listings for Northeast Los Angeles region, per ietrealstate.com/northeast-la.php, accessed 3/2/15

^{ix} Dataquick for home sales in January 2015 for Los Angeles Selected Area of North East LA

710 Surplus Property Sale Draft EIR

Public Comment Form

Your comment has been submitted.

Thank you for providing comments on the SR-710 Surplus Property Sale Draft Environmental Impact Report. We appreciate your feedback. A response to your comment will be included in the Final Environmental Impact Report.

Contact Information

First Name: CHRISTOPHER

Last Name: SUTTON

Address: 586 La Loma Road

City: Pasadena

State: CA

ZIP: 91105-2443

Email: christophersutton.law@gmail.com

Topics

Alternatives

Caltrans fails to provide an alternative in the DEIR that provides relocation assistance, relocation payments, and replacement housing to the 148 families that Caltrans has concluded in its Displacement Relocation Impact Report ("DRIR") will occur as a result of the Affordable Sales Program. Government Code section 54235 in the Roberti Law and Public Resources Code sections 21000 through 21004 in CEQA together mandate that the displacement of families as a result of the sale of surplus Caltrans properties is an adverse environmental impact that must be minimized and mitigated to the maximum extent feasible. The DEIR fails to analyze alternatives to the proposed Affordable Sale Program that could minimize family displacements. One such alternative would be for Caltrans to use local income data to determine "area median income" and "150 percent of area median income" instead of using county-wide income data. Caltrans is using local data to calculate market values of properties and market rental rates, which raises those dollar amounts above what many Caltrans tenants can afford, and Caltrans use of county-wide income data sets the eligible income level lower, thereby disqualifying many tenants from buying or renting at a price or rental rate based on their own actual income. Caltrans' use of differential data sources is predicted by its own DRIR to lead to the displacement of about 148 families under the Affordable Sales Program who could otherwise remain in their homes if Caltrans were to use local income data, as allowed by the U.S. H.U.D. regulations cited in the Roberti Law at

ATTACHMENT #3

Section 54236(h). CEQA section 21004 mandates Caltrans to use its discretionary power to minimize adverse environmental impacts such as the displacement of families. The DEIR needs to analyze alternatives that do so. The DEIR's failure to analyze such alternatives is a violation of CEQA and the goals of the Roberti Law. Also, Caltrans has failed to provide an alternative in the DEIR that provides for the active restoration and preservation of vacant residences owned by Caltrans and already determined to be eligible for inclusion on the National Register of Historic Places. Caltrans needs to commit funds derived from the sales of other properties to keep it in compliance with the U.S. Historic Preservation Act and to ensure the restoration and preservation of the approximate 100 structures now owned by Caltrans within the SR 710 North Corridor that are eligible for inclusion on the National Register of Historic Places. Just two of these vacant structures are 1199 and 1200 S. Pasadena Avenue in Pasadena 91105. Otherwise Caltrans could be barred from receiving federal funds for this transportation corridor or other transportation projects. The DEIR needs to analyze an alternative that restores and preserves all the historic properties now owned by Caltrans in the SR 710 North Corridor.

Community Demographics and Character

Caltrans has concluded in a Displacement Relocation Impact Report that about 148 families will be displaced by the Affordable Sales Program. This displacement is caused in part by Caltrans selecting different geographic areas from which to derive data regarding "area median income" and "market value" and "market rent." Caltrans relies on county-wide data from all of Los Angeles County to determine "median income," "very low income," "low income," and "moderate income." Yet Caltrans uses real estate sales data and rental data from the cities of Pasadena, South Pasadena, Los Angeles, and adjoining communities to determine "market value" for sales prices and "market rent" for rental rates on properties in the SR 710 North Corridor. This use of differential data sources has a perverse impact that will lead to the predicted displacement of families, including families with one or more disabled family members. By using these differential types of data, the values for property sales and property monthly rental rates are set much higher than most of the existing tenants in the properties can afford. Yet, by using county-wide income data these same tenants are determined to be above the income categories which would entitle them to purchase or rent the properties at a price derived from their actual income. Caltrans' use of county-wide income data places most existing tenants above the income category of "150 per cent of area median income" found in Government Code section 54237(a)(3) in the Roberti Law. Caltrans has chosen to select a county-wide data source for calculating "area median income" instead of using data of the median income from the three zip codes where the properties are located and where the tenants reside. Caltrans needs to use consistent data sources. To be fairer to the existing tenants, to further the affordable housing and community preservation goals of the Roberti Law, and to reduce family displacements, Caltrans must either use county-wide data for both income and value determinations, or use local zip codes for both income and value determinations. Using consistent data sources will reduce the number of predicted displacements that will be caused under

the Affordable Sales Program, and better comply with CEQA at Public Resources Code section 21000, 21001, 21001.1, 21002, 21003, and 21004 and Government Code section 54235 in the Roberti Law --- Caltrans has an affirmative duty to reduce and mitigate the impacts of the Affordable Sales Program, and to reduce the number of families predicted to be displaced by the Program. Using median income data from the local zip codes where the tenants reside in Caltrans properties will be the most effective in reducing displacements by raising the calculated level of "150 percent of area median income" so that a greater number of existing tenants can qualify for purchase prices and affordable rents based on the income levels in their local communities. Otherwise, Caltrans should use market data and rental data from the entire county to reduce purchase prices and lower rental rates, but this alternative may not be as effective in lowering the number of families displaced under the Affordable Sales Program. Government Code sections 54235 and 54236(h), CEQS section 21004, California H.C.D. regulations and U.S. H.U.D regulations allow Caltrans to calculate "area median income" in an alternative manner, and CEQA requires Caltrans to do so in a manner which reduces the maximum degree feasible the displacement of families under the Affordable Sale Program. The draft regulations need to be amended to include the goal of community preservation and reducing tenant family displacement as set forth in Government Code section 54235 of the Roberti Law. Those sections mandate Caltrans to reduce the displacement of families when surplus properties are offered for sale, and determine that such displacement is an environmental impact that must be mitigated using funds, resources, and powers available to Caltrans and within its discretion.

Environmental Justice

Caltrans has failed to include in the DEIR or the proposed Affordable Sales Program any analysis of the impact on disabled persons of the Affordable Sales Program. The unreasonably short deadlines for an existing tenant to respond to an offer to sell from Caltrans have no reasonable accommodation process for people who cannot respond within the deadline due to their age or disability or due to the age or disability of members of their household. Likewise, there is no analysis of the economic impacts on households which include one or more disabled persons. Caltrans fails to analyze any alternative price reductions or Caltrans financing of the purchases to accommodate such households. By utilizing market data from local zip codes to determine market values for sales and market rental rates for continued occupancy Caltrans is using data from nearby higher income areas and areas of lower minority populations to set the sales prices and rental rates on properties Caltrans owns in the SR 710 North Corridor. This discriminates against the lower income and higher minority populations within the properties owned by Caltrans. Caltrans' management practices include: deferred maintenance (often for years or decades), not paying for household water and landscaping (usually paid for by private landlords in adjacent area to maintain the property's quality), and using contractors of lower quality work than used for private rental properties. Most higher-quality maintenance contractors refuse to work for Caltrans due to quirky and obnoxious Caltrans personnel and due to extreme delays in

being paid by Caltrans. These endemic Caltrans management traits regarding the SR 710 North Corridor properties do not apply to the privately owned and privately-managed residences in adjacent areas. That is, Caltrans is a terrible property manager, which the employees and Directors of Caltrans District Seven in Los Angeles have admitted for decades. Long term Caltrans management is itself a negative factor in a property's rental value and market value. It is common knowledge in the real estate industry that Caltrans mismanages and neglects the properties it owns, rents, and offers for sale. It is market fact that the quality of all the properties have severely eroded under Caltrans management. Caltrans' reputation as a bad property manager and as having a practice of passive neglect on all properties it owns reduces their rental value and sales market value. This Caltrans "blight" on such properties is not taken into account by Caltrans when it determines rental rates and sales prices. Caltrans assumes it is a perfect property manager, or at least that its management has no economic impact. This a false assumption. This false assumption results in Caltrans setting artificially higher rental rates and high sales prices within the SR 710 North Corridor, where there are greater numbers of lower income and minority persons. The Affordable Sales Program needs to include adjustments downward in sales price and rental rates to reflect the long term, ongoing, and well-know "Caltrans property management blight" on the quality and desirability of the properties owned by Caltrans. Caltrans devalues every property it owns and manages simply by being Caltrans.

Cultural Resources

Caltrans has failed to provide or analyze the past and future impact on historic resources Caltrans has owned for decades that has occurred due to Caltrans mismanagement and neglect and will occur in the future as a result of the Affordable Sales Programs. Particularly on the approximate 100 Caltrans owned properties already eligible for inclusion in the National Register of Historic Places under the federal Historic Preservation Act. Examples are 1199 and 1200 S. Pasadena Avenue in Pasadena 91105.

Other

The Roberti Law (Government Code sections 54235 to 54237.8) is not the only state law under which these properties in the SR 710 North Corridor can be sold by Caltrans. Streets and Highways Code sections 118, 118.1, 118.5, 118.6, and 119 provide an alternative process for sale of the properties in the SR 710 North Corridor. Caltrans has failed to adopt any regulations to implement any alternative sales programs under those laws. Caltrans has continued to violate the third paragraph of Streets and Highways Code section 118.6 by failing to adopt sales and rental regulations under the Administrative Procedures Act which implement Streets and Highways Code sections 118, 118.1, 118.5, 118.6, and 119. The third paragraph of Section 118.6 reads as follows: "The department shall adopt rules and regulations to determine which real property outside of calculated right-of-way lines is no longer needed or used for highway or other public purposes, and which is available for sale or exchange. The

department is authorized to lease all real property not presently needed or used for highway purposes pending the sale or exchange of such property." Despite this requirement in law neither the DEIR for the Affordable Sales Program's proposed regulations include any explanation on how Caltrans determined which properties to offer for sale first and which to offer for sale later. No regulations have been even proposed for the sale of properties by a process other than under the Roberti Law. The sale of vacant land, the sale of properties occupied for commercial purposes, the sale of properties occupied for non-profit purposes, and properties which include vacant structures not currently used for residential purposes could be sold under Streets and Highways Code sections 118, 118.1, 118.5, 118.6, 119 and other laws, but no regulations or analysis or any list of such properties or their potential sale are included in the DEIR or in the Affordable Sales Program. Caltrans has recently offered several vacant land properties for sale to the City of South Pasadena, but failed to adopt regulations for this process or to consider the procedures for sale or lease of properties under Streets and Highways Code sections 100.2, 100.21, 100.22, 100.25, 104.5, 104.6, 104.7, 100.8, 100.9, 100.10, 100.11, 100.12, 100.13, 100.15, and 116. The DEIR and regulations need to consider all the alternative means by which the sales of Caltrans properties are permitted.

Contact

Allison Morrow
Senior Environmental Planner,
Gateway Corridors
Caltrans, District 7
100 S Main Street, MS 16A
Los Angeles, CA 90012

(213) 897-3247
allison.morrow@dot.ca.gov

A-16-1

Caltrans has complied with all requirements of the APA Rulemaking process, including providing all interested parties with an opportunity to submit oral and written comments while imposing reasonable limitations on oral presentations, per Government Code section 11346.8(a).

A-16-2

The action being analyzed in the SR-710 Surplus Property Sales environmental document involves the sale of the surplus properties originally acquired by Caltrans. While this property sale process would be implemented in compliance with the procedures outlined in the Affordable Sales Program (ASP) Regulations, the ASP regulations are being drafted and finalized as part of a separate regulatory process, with a separate public input process. Caltrans has responded to this commenter's remarks, they can be found at A-3, T1-15, T1-20, T2-4, and T2-17.

A-16-3

The Affordable Sales Program was created in accordance with the Roberti law. Also, Caltrans is exploring opportunities to reduce the number of displacements, such as working with CalHFA to identify lending resources for tenants that might not otherwise qualify for financing.



August 14, 2015

Kimberly Erickson
ATTN: Affordable Sales Program
California Department of Transportation
1120 N Street, MS 37
Sacramento, CA 95814

Comments on Proposed Regulations for Affordable Sales Program

Dear Ms. Erickson,

Pasadena Heritage appreciates this opportunity to provide feedback on the revised Regulations for the Affordable Sales Program. As a non-profit organization dedicated to the preservation of historic and cultural resources in Pasadena, we have been closely involved with this project for almost 40 years. We now welcome the release of these properties and the community benefits their return to private ownership will bring.

Echoing the comments of our colleagues at the National Trust for Historic Preservation, the Los Angeles Conservancy, and the City of South Pasadena, we are also very concerned that the regulations fail to address the role of historic preservation covenants. As stated in our letter dated August 28, 2014, local municipalities may or may not have historic preservation ordinances in place that protect historic resources, and those that do may vary greatly from community to community and are subject to change. Because of this, Pasadena Heritage believes a combination of historic overlay designation and preservation covenants are necessary to achieve adequate and long-term protection required under CEQA and California Civil Code Section 815-816. We appreciate and support further work of Caltrans with qualified easement-holding preservation organizations to explore this process, to develop clear and appropriate language, and address the compensation necessary to adequately enforce the covenants in perpetuity. It is of great importance that this issue be resolved prior to the offering and sale of any historic resources, either individually or those located within identified historic districts.

Additionally, Caltrans should re-instate the individual parcel boundaries of all properties it holds in the SR-710 corridor; a legal description is required in order to convey covenants or ownership.

We also note the need for greater clarification by Caltrans on determining a reasonable price that reflects the existing conditions for properties that are to be repurposed and are not to be redeveloped for profit, for example by the cities and/or non-profit organizations to provide public, free or low-cost services.

Thank you for the opportunity to comment and provide feedback on the Affordable Sales Program. We gladly offer our further assistance to ensure adequate long-term protection for historic resources prior to their sale.

Sincerely,

Susan N. Mossman
Executive Director

Jesse Lattig
Preservation Director

A-17-1

A-17-2

A-17-3

A-17-1

As stated in Section 4.3.4.2 Alternative 2—Action Alternative in the environmental document, Caltrans will ensure that any agreements to protect historical resources will be enforceable by way of third-party monitoring by a non-profit. Also per minimization measure CR-2, Caltrans will provide a one-time monetary payment, a stewardship fee, to ensure that the qualified organization will have the financial support for the continued monitoring of the historic covenants or other protective measures as agreed.

A-17-2

This comment deals with issues not within the scope of the rulemaking power conferred on Caltrans. Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184.

A-17-3

The regulation section 1477(a)(4) provides the factors considered for feasibility and section 1476(bb) provides the definition for reasonable price.

Ortega, Lourdes@DOT

From: Morrow, Allison A@DOT
Sent: Thursday, September 03, 2015 11:33 AM
To: Ortega, Lourdes@DOT
Subject: FW: Affordable Sales program - Comment

From: Cunningham, Deborah L@DOT **On Behalf Of** Affordable Sales Program@DOT
Sent: Thursday, September 03, 2015 11:33 AM
To: Morrow, Allison A@DOT
Subject: FW: Affordable Sales program - Comment

Here you go...

Deborah L. Cunningham
916-654-3212
Senior Right of Way Agent
HQ Organizational Development

From: Elena Phleger [<mailto:ephleger@sequoyahschool.org>]
Sent: Monday, August 24, 2015 2:41 PM
To: Affordable Sales Program@DOT
Subject: Affordable Sales program - Comment

RE: Proposed Sales Regulations for State Route 710 Properties

August 24, 2015

Sequoyah School will welcome the release of properties currently owned by Caltrans along the SR-710 corridor.

Current Uses –Social and Economic Impacts: The proposed surplus properties sales will take place within vital established communities. Sequoyah School, along with other schools, convalescent homes, and community gardens, is one of many non-profit institutions and one of many Caltrans current tenants in good standing situated in the SR-710 corridor that provide valuable and essential services to the citizens of Pasadena and surrounding regions. Established for-profit businesses and institutions in the SR-710 corridor also provide valuable community services. Caltrans should address what impact any closure, temporary suspension or relocation of such established institutions and businesses caused by forthcoming implementation of proposed sales regulations may have on the communities those institutions and businesses serve. Consideration should be given to how current businesses and institutions in the SR-710 corridor might be affected by various sales process alternatives and timelines.

Furthermore, Caltrans should provide timely and fulsome information related to any contemplated sales process so that tenants in good standing may be prepared to effectively participate in the process. At this point in time, Caltrans has not adequately clarified the process or addressed the timing for non-residential sales (including the historic property occupied by Sequoyah School); how compliance with Government Code section 54237 affects priorities in sales process such as whether non-residential sales would be taken up in concurrence with residential sales or follow residential sales at each phase; whether non-residential properties occupied by institutional tenants would be approached by Caltrans on a site by site basis; whether historic non-residential properties would undergo individual additional environmental study as required by CEQA and in compliance with state code; the process for notifications appraisals, offers etc.

A-18-1

Historic Properties: The SR -710 corridor traverses neighborhoods with significant historic properties. Caltrans should assess the potential impacts caused by the sales of historically significant or aesthetically important properties. Sales must comply with CEQA and Public Resources Code section 5024 ensuring that there is no adverse effect to any historic properties. Eventual sales could either jeopardize or encourage ownership by responsible stewards of historic properties. It is our view that proposed regulations and the resulting sales process should facilitate the transfer of ownership to current non-residential tenants in good standing who have invested significant resources in preservation of buildings and grounds, and who have over many years worked closely with Caltrans and the State Historic Properties Officer to conserve and improve individual historic properties. Regulations and implementation should ensure the continued preservation of historic sites and the revitalization of neglected buildings, sidewalks and streets.

A-18-2

Community Fabric/Open Space: Caltrans should address the potential impacts of transferring properties to owners who intend to develop sites into higher density uses. Higher density uses may result in increased traffic congestion on city streets, less open space within existing neighborhoods and the removal of mature trees. The SR-710 corridor, and the non-profit institutions and businesses that currently comprise it, represent an important part of the fabric of Pasadena. Caltrans should consider the importance to the community of maintaining this valued status quo.

A-18-3

Finally, please send copies of all public notices associated with SR 710 Sales Project to me at the address below.

Please do not hesitate to contact me with any questions.

Sincerely,

Elena Phleger

--

Elena Phleger
Director of Development and Communication
Sequoyah School
535 S Pasadena Avenue
Pasadena CA 91105
626-795-4351 x 215
sequoyahschool.org

A-18-1

California Code Title 1, Sections 2000-2004 require the completion of a Standardized Regulator Impact Assessment (SRIA) for major regulations. Caltrans completed a SRIA including an assessment of the total impacts on the regional economy. As stated in the SRIA, the assessment does not include impacts to individual businesses, although they may be indirectly impacted from changes in household disposable incomes as properties are purchased at either an affordable or fair market price. Theoretically, individuals, businesses and governments may benefit from affordable housing, but it is not for certain without a standardized methodology and more research to understand the correlation between affordable housing and a local economy.

Government Code Section 54237(f) sets forth the priority for non-residential properties. The most current information regarding the process and the timelines can be found at <http://www.dot.ca.gov/dist07/business/710sales>, specifically question #4 in the Frequently Asked Questions.

A-18-2

Please refer to section 4.3 Cultural Resources in the environmental document which discusses Public Resource Code Section 5024

A-18-3

This comment deals with issues not within the scope of the rulemaking power conferred on Caltrans; however, all properties released for sale are subject to the land use restrictions of the local City and County.



523 West Sixth Street, Suite 826
Los Angeles, CA 90014

213 623 2489 OFFICE
213 623 3909 FAX
laconservancy.org

August 14, 2015

Submitted electronically

Andrew Nirenberg
Acting Chief, Division of Right of Way and Land Surveys
ATTN: Affordable Sales Program
California Department of Transportation
1120 N. Street, MS 37
Sacramento, CA 95814
Email: Affordable_Sales_Program@dot.ca.gov

RE: SR 710 Homes sales, Affordable Sales Program

Dear Mr. Nirenberg,

The Los Angeles Conservancy offers the following comments on the Affordable Sales Program to ensure the disposition process adequately addresses historic resources. We are very encouraged by Caltrans' intent to release surplus properties and return them to the private housing market, which will ultimately strengthen and stabilize neighborhoods throughout Los Angeles, unincorporated areas of East Los Angeles, South Pasadena, and Pasadena. For the purposes of this letter and not to repeat comments already provided elsewhere, we are focusing on Los Angeles and the unincorporated areas of East Los Angeles.

The Conservancy would like to ensure protections are in place for identified historic properties that will ultimately transfer out of Caltrans' hands into private ownership. Part of this disposition process should include an up-to-date inventory of historic resources, identifying historic resources eligible at both the local, state and national levels. This includes properties that are individually significant and those located within eligible and/or listed historic districts. We are concerned that there is presently only a focus on National Register-listed or eligible properties. All transferred properties that are identified as historic, whether at the local, state or national levels, need to be adequately protected from future harmful alterations or demolition.

To date neither El Sereno nor the unincorporated areas of East Los Angeles have been fully inventoried. The City of Los Angeles' SurveyLA initiative is set to begin its survey of El Sereno in November, with results made publicly available later in

A-19-1

A-19-2



the Summer or Fall of 2016. The Conservancy is not aware of any such plans for the affected unincorporated areas of East Los Angeles. We would strongly encourage Caltrans to begin work to help undertake this effort, and again identify those resources eligible at both the local, state and national levels.

A-19-2

There also needs to be language and a clear process in place to ensure long-term protections before the disposition and sale of properties moves forward. This aspect should be resolved prior to the offering and sale of any historic resources, either individually or those located with identified historic districts. We are especially concerned as Phase 1B includes known historic resources within the El Sereno area. The Conservancy believes a combination of local landmark designation and covenants and/or easements are necessary. We do not believe local landmark designation alone can fully address the need, as it provides greater uncertainty in terms of long-term protection as it is subject to change and political interference. Further, no such system currently exists for the unincorporated areas of East Los Angeles.

A-19-3

Caltrans should work with qualified easement-holding preservation organizations to further explore this process, to develop clear and appropriate language and address compensation that will be required to adequately enforce the covenant/easement long-term. The Conservancy has a conservation easement program in place already and we are happy to work with Caltrans to develop a process that might apply to the disposition of its historic properties, especially those located in the El Sereno and unincorporated areas of East Los Angeles. We suggest coordinating such a process with other relevant organizations as more than one entity might be involved, including Pasadena Heritage and the National Trust for Historic Preservation.

A-19-4

The Conservancy also strongly believes there should be a priority on existing and previous tenants in terms of priority, and community organizations that have clearly established an intent and working relationship with Caltrans to acquire a building that is now set for disposition.

One example is the Maycrest Bungalow Court at 4215-4223 North Maycrest Avenue in El Sereno. Caltrans has been working with El Sereno Bungalow Collective for more than five years to develop a reuse and plan for these long-vacant structures (empty since 1994). The Collective has a vested interest as an entity located immediately adjacent to this property. We greatly appreciate Caltrans willingness to date to entertain reuse options and provide access to these structures. We think it's important that the Collective, like current and former tenants in good standing, be given priority before private housing-related entities. If not the Collective directly, we think it's important to offer to the local government which may act as an intermediary to ensure the property is ultimately transferred into the right hands.

A-19-5

There needs to be greater clarification by Caltrans for these unique types of properties regarding their release and the establishment of a reasonable price (reflecting the existing conditions). Further we encourage Caltrans to develop a process that can identify and support circumstances (like the El Sereno Bungalow Collective) where properties are to be repurposed, by the cities and/or non-profit organizations, to provide public, free or low-cost services to low-income residents and are not to be redeveloped for profit.

A-19-6

We also want to strongly urge Caltrans to identify and treat the Maycrest Bungalow Court as an historic resource. We have consulted with SurveyLA on this property in advance of their upcoming survey of El Sereno. Initial feedback indicates these structures are eligible both locally and at the state level, and may be eligible for the National Register also, as this example represents a rare housing type and is particularly unique in its design and layout as a duplex form of a bungalow court.

A-19-6

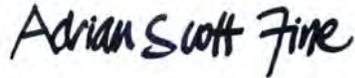
Thank you for the opportunity to comment and provide feedback on the Affordable Sales Program. We look forward to working with Caltrans as this program is further defined and developed prior to any sales of historic resources. The Conservancy would like to serve as a resource and partner with Caltrans to ensure adequate long-term protection for these properties.

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.

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 or 213-430-4203.

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: Cindy Heitzman, California Preservation Foundation
Michael LoGrande, Ken Bernstein, City of Los Angeles, Department of City Planning, Office of
Historic Resources
Councilmember Jose Huizar
Betsy Merritt, Chris Morris, Brian Turner, National Trust for Historic Preservation
Claire Bogaard, No 710 Action Committee
Sue Mossman, Jesse Lattig, Pasadena Heritage

A-19-1

This comment requests to ensure that protections are in place for identified state owned historic properties that will be transferred (sold). Please refer to Section 4.3.5 Avoidance, Minimization, and/or Mitigation Measures to read the measures that would avoid and/or minimize impacts related to cultural resources. Please refer to 4.3.1 Regulatory Requirements to read the laws and regulations applicable to Caltrans.

A-19-2

Please see response to comment A-19-1

A-19-3

The covenants and the ASP regulations will provide a clear process in place to ensure long-term protections before the disposition and sale of properties moves forward. Please see response to comment A-19-1

A-19-4

As stated in Section 4.3.4.2 Alternative 2—Action Alternative in the environmental document, Caltrans will ensure that any agreements to protect historical resources will be enforceable by way of third-party monitoring by a non-profit. Caltrans acknowledges that Pasadena Heritage and National Trust for Historic Preservation is willing to work together in order to create covenants and easements with regard to historical resources.

A-19-5

Government Code section 54237 sets forth the priorities for sales. A change would require legislation.

A-19-6

Government Code section 54237 sets forth the priorities for sales. A change would require legislation. The proposed regulation section 1477(a)(4) provides the factors considered for feasibility and section 1476(bb) provides the definition for reasonable price. Please see response to comment A-19-1.



August 14, 2015

via email: Affordable_Sales_Program@dot.ca.gov

Kimberly Erickson
ATTN: Affordable Sales Program
California Department of Transportation
1120 N Street, MS 37
Sacramento, CA 95814

Re: Comments on Proposed Regulations for Affordable Sales Program

Dear Ms. Erickson:

The National Trust for Historic Preservation appreciates the opportunity to comment on the regulations proposed by the California Department of Transportation (Caltrans) to implement an Affordable Sales Program to dispose of 460 properties owned by Caltrans in Pasadena, South Pasadena, and Los Angeles. These properties were acquired by Caltrans decades ago with the original intention of destroying them for the construction of the proposed surface freeway through the Route 710 corridor. But they are no longer needed by Caltrans, since the surface freeway project was enjoined by the federal court because it violated federal law, *City of South Pasadena v. Slater*, 56 F. Supp. 2d 1106 (C.D. Cal. 1999), and the Federal Highway Administration (FHWA) then withdrew its approval of the project.

The sale of these properties provides an important opportunity to bring renewed stability and vitality to the residential neighborhoods within the 710 corridor, after decades of uncertainty. In addition, these conveyances are expected to substantially increase the investment in maintenance of the properties. Approximately 25 percent of the properties being considered for conveyance are acknowledged to be historic. For these properties in particular, the opportunity for new owners to rehabilitate and maintain their historic character is an enormous benefit to the public interest.

The National Trust has previously submitted comments to Caltrans, dated September 2, 2014 and November 10, 2014, regarding the Affordable Sales Program and the Initial Study for the Caltrans Surplus Property Sale. In addition to reviewing the proposed regulations, we have also reviewed the Draft Environmental Impact Report (EIR) for the SR-710 Surplus Property Sales, dated July 2015, and we plan to submit separate comments on the Draft EIR on or before the applicable comment deadline of August 24, 2015.

With regard to the proposed regulations, we are concerned that the revised draft does not appear to be responsive to many of the comments submitted by the local governments in the corridor such as the Cities of South Pasadena and Pasadena.

- **We strongly oppose giving private housing developers, including for-profit developers, priority over public housing agencies.**

One of the comments repeatedly made, including by the Cities of Pasadena and South Pasadena, as well as the National Trust, has been that “housing-related *private* entities,” including for-profit developers, should not be given priority over “housing-related *public* entities,” such as local government housing agencies. Instead, the public housing agencies should be given priority as between these two groups. Caltrans has failed to offer any rationale for refusing to modify this provision.

A-20-1

In general, current and former tenants in good standing should have priority over housing related entities, but we strongly support the comments that public agencies should get priority over private entities.

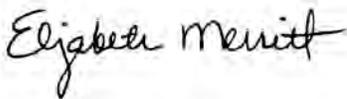
- **The regulations fail to address the use of historic preservation covenants.**

We are also very concerned that the regulations fail to address the role of historic preservation covenants. Approximately 25 percent of the properties to be offered for sale are historic, and thus, according to the Draft EIR, will be subject to historic preservation covenants or other measures to protect the historic character and features of the property. DEIR at 5-29. However, the Draft EIR also states that, “if no buyer has been identified for a historic property due to the presence of a protective covenant associated with the property, Caltrans will remove the covenant in order to successfully sell the property.” DEIR at 5-30. The removal of preservation covenants could increase the sales price of the properties, and thus could have implications for the Affordable Sales Program as a whole. The decision whether or not to remove a historic preservation covenant could have significant impacts, and yet the regulations fail to set forth any procedures or criteria for making those decisions. Nor do the regulations provide adequate notice that a significant number of the properties would be sold subject to preservation covenants. This omission needs to be corrected before the disposition of the properties commences.

A-20-2

Thank you for considering the comments of the National Trust for Historic Preservation.

Sincerely,



Elizabeth S. Merritt
Deputy General Counsel

cc: Margaret Lin, City of South Pasadena
Linda Dishman and Adrian Fine, Los Angeles Conservancy

Sue Mossman and Jesse Lattig, Pasadena Heritage
Christina Morris, National Trust for Historic Preservation, Los Angeles Field Office

A-20-1

Government Code section 54237 sets forth the priorities for sales. A change would require legislation.

A-20-2

The language that Caltrans will remove the covenant in order to successfully sell the property has been eradicated. The covenants will now be attached to the deed of the historical resource/house.

INTERESTED PARTIES/GENERAL PUBLIC

Interested Parties/General Public	
P-1	Shannon Lechuga
P-2	Dr. Cylde T. Williams/ Coalition for a Safe Community
P-3	Chang Cho
P-4	Alison Lau
P-5	Hurbert Ho
P-6	Watraud Wheeler
P-7	Virgina Flores
P-8	Donna Janosik
P-9	Ana Moreno
P-10	Weltraud Wheeler
P-11	Rosalva Garcia
P-12	Vincent N. Unpingco
P-13	Victoria Sandoval
P-14	Tom Williams

Shannon Lechuga

P-1

Please let us know when the sale negotiation of individual homes will be taking place for this project. my grandmother will qualify based on all the guidelines I have read and we are just looking for a date.

P-1-1

P-1-1

All information regarding the Affordable Sales program can be found in the proposed regulations. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>.

The DEIR clearly states that the Draft Relocation Impact Report, April 2015 is involved in the entire Project Description and therefore is pivotal to development of more mitigative/compensatory alternatives. The referenced document is not available through the general WWW nor from the Caltrans/Distr. 7 webpage. Without this document no meaningful review and commenting can be done by the PUBLIC. Without this document, we cannot proceed.

P-2-1

We request a day-for-day extension of the public comment period until this DRIR is made available to the Public.

Project Description - The DEIR clearly states that the Draft Relocation Impact Report, April 2015 is involved in the entire Project Description and therefore is pivotal to development of more mitigative/compensatory alternatives. The referenced document is not available through the general WWW nor from the Caltrans/Distr. 7 webpage. Without this document no meaningful review and commenting can be done by the PUBLIC. Without this document, we cannot proceed.

P-2-2

We request a day-for-day extension of the public comment period until this DRIR is made available to the Public.

P-2-1

All technical studies will be readily available upon request. The Draft Relocation Impact Report was posted online and can be found at <http://www.dot.ca.gov/dist07/resources/envdocs/docs/710sales/>. The SR-710 Surplus Property Sales Draft Environmental Impact Report public circulation ended on September 8, 2015, extended from August 24, 2015. For a total of 60 days.

P-2-2

Please see response to P-2-1

P-3-1

This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

P-4-1

This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

According to real estate news, a large portion of real estate purchases in Southern California are by real estate investors and speculators rather than actual users who need a home. Would Caltrans consider giving priority to first time home buyers of the surplus properties?

P-5-1

P-5-1

Government Code section 54237 sets forth the priorities for sales. A change would require legislation and cannot be made through this rulemaking process. Caltrans has designed a website to assist prospective buyers to better understand which type of properties they are eligible to purchase, when and how the offers of purchase can be made, and in what priority a prospective buyer can make an offer. The website can be found at <http://www.dot.ca.gov/dist07/business/710sales/>

Watraud Wheeler

P-6

I want to stay another two years. I have lived here since 1962. | P-6-1

P-6-1

The commenter's preference to stay in their residence for an additional two years has been acknowledged. This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

You made all the alternatives for owning the property but you didn't make an alternative of not owning the subsurface rights. Please make an alternative where the owner would own everything including ground under house.

P-7-1

I feel that you discriminate against families who are low income that cannot afford to purchase the house. But you should not calculate that. They might come up with the money. That's like counting your chickens before they hatch.

P-7-2

When you make the proposals for making the sales of homes and you have the Caltrans board. You should have people from the community should be represented on the board or at the meeting so they can help make a decision. The people from the community should have input on making decisions as well as just Caltrans.

P-7-3

P-7-1

As stated in the summary and Chapter 2 of the environmental document, Alternative 2 Variation A Option 2 the properties would be sold over a 5-year period with all subsurface property rights being conveyed with the properties. Alternative 2 Variation B consists of selling surplus parcels all at once, Option 2 would convey all subsurface property rights with the parcels.

P-7-2

Government Code section 54237 sets forth the priorities for sales. A change would require legislation and cannot be made through this rulemaking process. Caltrans has designed a website to assist prospective buyers to better understand which type of properties they are eligible to purchase, when and how the offers of purchase can be made, and in what priority a prospective buyer can make an offer. The website can be found at <http://www.dot.ca.gov/dist07/business/710sales/>

P-7-3

Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790. Questions can also be directed to your rental agent.

P-8-1

This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

Ana Moreno

P-9

I live on Lowell Ave, 90032 how is this going to affect me and How can I purchase a home from the surplus? P-9-1

P-9-1

Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790. Questions can also be directed to your rental agent.

Weltraud Wheeler

P-10

I have lived in the Caltrans-owned house since 1962 and hope that I can rent the house for another two years. I cannot buy the house and want to continue to live in the house for another two years.

P-10-1

P-10-1

The commenter's preference to stay in their residence for an additional two years has been acknowledged. This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

Rosalva Garcia

P-11

Please accept this letter as my public comment, in regard to the Environmental Impact Report.

I have been a Cal Trans tenant for 49 years, and have lived on Sheffield Avenue. I raised my children and grandchildren in this house. I live alone now, but there are still many families on this street. Building a freeway, even if it's underground, will pose a lot of dangers to families above in the form of cancer causing pollution. I hope you reconsider extending the 710 for the sake of local children.

P-11-1

However, if this project moves forward, I would like to remain here in 3216 Sheffield Avenue for at least 2 or 3 more years. I have been a respectful tenant and have taken proper care of this house for all these years. It is my hope that I can spend more time in this house to better prepare for a relocation, if necessary in the future.

P-11-2

Thank you kindly, Rosalva Garcia

P-11-1

The commenter's opposition of the Freeway Alternative for the SR-710 North Study has been acknowledged.

P-11-2

The commenter's preference to stay in their residence for an additional two or three years has been acknowledged. This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

August 22, 2015

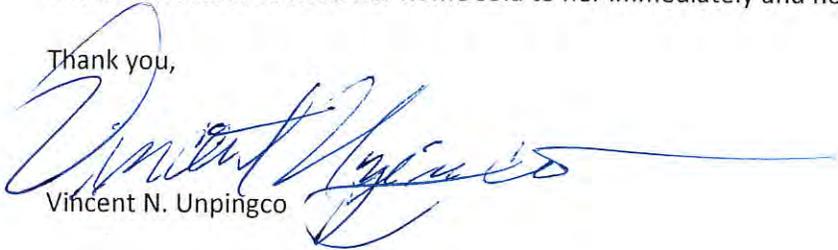
California Dept of Transportation, District 7
Mr. Ronald Kosinski, Deputy District Director *PK*
Attn: SF-710 Surplus Property Sales
100 South Main Street
Los Angeles, CA 90012

Dear Mr. Kosinski,

I write this on behalf of my grandmother who rents one of the homes from Cal Trans. I am writing to select Alternative 2; Variation B. Option 2. My grandmother has lived in her home for a very long time, and she deserves to have her home sold to her immediately and not wait 5 years.

P-12-1

Thank you,



Vincent N. Unpingco

P-12-1

The commenter's preference for Alternative 2, Variation B Option 2 of this action has been acknowledged. This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

August 11, 2015

P-13

RECEIVED

2015 AUG 14 AM 11:08

RIGHT OF WAY

Kimberly Erickson
ATTN: Affordable Sales Program
California Department of Transportation
1120 N. Street, MS 37
Sacramento, CA 95814

Dear Ms. Erickson;

I have reviewed the modified text of the proposed regulations on the Affordable Sales Program.

My mother has been living in her home for 45 years now and when she moved in 5 of her six children lived with her. So she has made a beautiful home for her children. One of them is my sister Maria who is disabled. She has been attending a special needs school for almost 30 years now. Mom and Maria are the only ones living in the home now and they have very very close ties, to neighbors, to her church, to volunteer organizations, and to the community as a whole.

Three generations of family have been involved in this community. We know the neighbors, the neighbors children and grandchildren. The neighborhood is a close knit family and they watch over my mother and help her when needed.

My mother is, and has been, an 'active member' of her church these past 45 years. She and my sister have very close spiritual ties to their pastors and their brothers and sisters in Christ. They love my sister Maria very much.

The DEIR report referenced the DRIR report (which was not attached) which denoted that 148 families would be relocated; however, the DRIR did not explain how this was determined. It only listed the elderly, low income and the disabled in the analysis. If these relocation factors are being targeted, then my mother has 3 strikes against her. And if this is true, this would be a real discriminating factor if my mother was not given an opportunity to purchase her home. She has been a tenant in good standing all these 45 years and has probably paid for the house 2 times over.... she keeps a very clean house and has taken care of it as much as possible.

P-13-1

The modified text of the Affordable Sales Program, doesn't really make clear on what happens in the event the owner dies. There is only a lot of legal jargon that is confusing. It's not clear whether family members can inherit the property? I ask this because my sister and I hope to take care of my sister Maria who needs 24-hour care when and if my mother passes. To displace or relocate my sister Maria would traumatize her, especially after a mother's passing.

P-13-2

I am asking that the document states clearly that family members can inherit their parent's property and that they are not restricted to the low income requirements.

Sincerely,


Victoria Sandoval

P-13-1

All technical studies will be readily available upon request. Caltrans has uploaded the DRIR and can be found at <http://www.dot.ca.gov/dist07/resources/envdocs/docs/710sales/>.

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

P-13-2

Section 1476(dd) of the proposed regulations speaks to the issue of heritability. Under the proposed regulations, the inheriting spouse's income will not trigger use and resale restrictions. Heirs may inherit the property. For this reason, no change was made to the proposed regulation.

Ortega, Lourdes@DOT

From: Morrow, Allison A@DOT
Sent: Thursday, September 03, 2015 11:27 AM
To: Cunningham, Deborah L@DOT
Cc: Ortega, Lourdes@DOT
Subject: RE: Comments - SR-710 Surplus Property Sales DEIR

Hi Debbie,
A lot of these people/organizations have already submitted their comments directly to us as well. Thanks.
Allison

From: Cunningham, Deborah L@DOT **On Behalf Of** Affordable Sales Program@DOT
Sent: Thursday, September 03, 2015 11:25 AM
To: Morrow, Allison A@DOT
Subject: FW: Comments - SR-710 Surplus Property Sales DEIR

The email below contains a number of issues related to the DEIR.

Deborah L. Cunningham
916-654-3212
Senior Right of Way Agent
HQ Organizational Development

From: Tom Williams [<mailto:ctwilliams2012@yahoo.com>]
Sent: Saturday, August 08, 2015 6:25 PM
To: Affordable Sales Program@DOT
Cc: Roberto Flores; Christopher Sutton
Subject: Comments - SR-710 Surplus Property Sales DEIR

As provided for in various web pages I wish to submit the following comments and requests:

1. Extend period for DEIR comments to Sept. 28 or after revisions **are circulated** (whichever come later) and with a minimum of **30 days prior to the close of DEIR** comment period and Add Meeting in South Pasadena. | P-14-1
2. Extend current draft regulations comments period to 30 days following the certification of the FEIR | P-14-2
3. Specify/Provide in formal Project Description (Action) for the DEIR and the relations/links of actions (by section/paragraph references) of the various alternatives and their processes to the various legislative and administrative references of the discretionary actions/approvals which form the basis of any actions herein this DEIR: a) proposed regulations, | P-14-3
 - b) Roberti Bill,
 - c) SB416, and
 - d) State Street & Highway CodeProvide and circulate at least 30 days prior to close of DEIR comments
4. Provide priorities and concordance for Relocations and impacts between DEIR references: DRIR 2014 (as part of DEIR SR-710 North Study) and DRIR 2015 (now included on Sales Web page) **and circulate 30 days prior to the close of DEIR comments.** | P-14-4
5. Remove references to DRIR 2014 for DEIR for Sales, unless Item 4 is provided. | P-14-5
6. Provide links to ALL Technical Studies included in the DEIR on the SR-710 Sales webpage and all referenced documents and emails therein - **and circulate 30 days prior to the close of DEIR comments.** | P-14-6

7. Provide LATimes reference for use of 2000 census information for El Sereno in the DRIR 2015 **and circulate 30 days prior to the close of DEIR comments.**

P-14-7

8. Provide 2010 Census information for precincts excluding Monterey Hills development as they are not part of the referenced LA-32 Neighborhood Council...similarly exclude the University Hills and Hillside Village districts from populations and community characterizations and economic and income analyses - **and circulate 30 days prior to the close of DEIR comments.**

P-14-8

9. Rename the Alternative of "No Action" to "Future without Projection/Action" and assess for a period up to 2035.

P-14-9

10. As no time frames are given in any legislation or codes or regulations, remove alternative involving a "5-Year Period" for the sale.

P-14-10

11. SR-710 North Study DEIR alternatives must be coordinated to the specific properties through a Drawing of current alternative designs and affected properties. Provide **and circulate 30 days prior to the close of DEIR comments** maps of all affected parcels and specific alternative design elements affecting the parcels.

P-14-11

12. An SR-710 Project Alternatives has been proposed which would eliminate sale effects on most if not all parcels in the City of Los Angeles and CD14 has commented that the LACity Council has a LACC Resolution (2012) prohibiting construction within and beneath the City of Los Angeles and this resolution must be considered under Land Use Impacts assessments.

P-14-12

Other comments will be submitted during public hearings and before the close of the comment period.

Dr. Tom Williams
LA-32 Neighborhood Council, Board Member
Sierra Club, Angeles Chapter, Transportation Comte.
Citizens for a Safe Community

P-14-1

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. Caltrans conducted two public hearings on August 6, 2015 in El Sereno and August 10, 2015 in Pasadena. Caltrans did not hold a public hearing in South Pasadena.

P-14-2

Caltrans extended the public comment period to 60 days, ending on August 24, 2015 to provide public comment on non-substantial and sufficiently-related changes on the proposed regulations and SRIA.

P-14-3

The proposed Affordable Sale Program Regulations can be found in Appendix F. Government Code 54235-54238.7 (Roberti Bill) can be found in Appendix B. Senate Bill (SB) 416 can be found in Appendix C. Street and Highway Code 118 has been added to Chapter 6 References.

P-14-4

SR-710 North Study Relocation Impact Report (2014) can be found at http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/. The SR-710 Surplus Property Sales Draft Relocation Impact Report (2015) is listed in Appendix G of the DEIR and is available online at <http://www.dot.ca.gov/dist07/resources/envdocs/docs/710sales/>

P-14-5

Reference to the SR-710 North Study Relocation Impact Report (2014) was used to illustrate that three state owned parcels would be necessary for the proposed SR-710 North Study alternatives. Therefore, the SR-710 North Study Relocation Impact Report (2014) reference shall remain.

P-14-6

All technical studies will be readily available upon request. Caltrans extended the public comment period to 60 days, ending on September 8, 2015 to provide public comment on the DEIR.

P-14-7

The Los Angeles Times reference can be found at <http://maps.latimes.com/neighborhoods/neighborhood/el-sereno/>. Caltrans extended the public comment period to 60 days, ending on September 8, 2015 to provide public comment on the DEIR.

P-14-8

The proposed regulation complies with current law. Government Code Section 54236(h) specifies how median income should be determined. Caltrans based median income on the best available information and upon the recommendations of the California Department of Housing and Community Development (HCD).

P-14-9

Section 1 15126.6(e)(1) of the CEQA Guidelines dictates that an EIR must include a discussion of the “no project” (“no action” for this EIR), alternative and its impact. The discussion of the “no project” alternative allows the public and the decision-makers to assess the effects of approving the project versus the effects of not approving the project. With regard to the commenter’s concern for assessing the No Action (No Sale) up to 2035, Caltrans does not have the means to forecast real estate predictions for the next 20 years and therefore will not assess the No Action Alternative for 2035.

P-14-10

Section 15126.6 of the CEQA Guidelines requires that an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Caltrans chose Alternative 2 Variation A which assumes that the action is adopted and implemented over a 5 year period for the reason that the Standardized Regulatory Impact Assessment (SRIA) analysis is of the first five years for the initial property sales and double escrow sales.

P-14-11

Maps of the proposed alternatives for the SR-710 North Study can be found at http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/ under Project Alternative Maps.

P-14-12

The Los Angeles City Council Resolution (2012) which can be found at http://clkrep.lacity.org/onlinedocs/2012/12-0002-S82_CA_08-28-12.pdf does not prohibit construction within and beneath the City of Los Angeles. The resolution opposes the proposed extension of the North Long Beach 710 Freeway and any above ground highway or freeway that would cut through the City of Los Angeles. The resolution will not affect the sale of the surplus properties and will not be evaluated under Land Use.

COMMENT CARDS

Comment Cards	
CC-1	Alex Johnson
CC-2	Robert Ahumada
CC-3	Tina Moreno
CC-4	Mike Rivera
CC-5	Candice Alvillar
CC-6	Dr. Tom Williams
CC-7	Dr. Tom Williams
CC-8	Nataliia Bacchus
CC-9	Marie Ibsen Risigari-Gai
CC-10	Marie Ibsen Risigari-Gai
CC-11	Robert and Linda Cole
CC-12	Richard Johansson
CC-13	Maria Crespo
CC-14	Victoria Sandoval
CC-15	Josie Broomis
CC-16	Mark Ng



CC-1



SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015

Name: Alex Johnson

Address: _____

Phone Number: _____ E-Mail: alexwaynejohnson@gmail.com

COMMENTS: Can there be / will there be a "Fast track" sales process for tenants who want to buy their homes who don't need financial assistance to purchase their homes?

CC-1-1

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**. Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

CC-1-1

Government Code Section 54237 sets forth the priorities for sales. A change would require legislation and cannot be made during this rulemaking process. The most current and up to date information regarding the Affordable Sales Program can be found at <http://www.dot.ca.gov/dist07/business/710sales/>.



CC-2



**SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015**

Name: ROBERT ANUMADA

Address: 4426 MAYCREST AVE, LOS ANGELES CA, 90032

Phone Number: _____ E-Mail: MAGNIFICATO3@YAHOO.COM

COMMENTS: MY NEIGHBORS HAVE LIVED IN THEIR HOMES A
LONG TIME AND THEY DESERVE AN IMMEDIATE SALE OF
THEIR HOMES TO THEM. THEREFORE I SUPPORT ALTERNATIVE 2
VARIATION B, OPTION 2.

CC-2-1

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**.
Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

CC-2-1

The commenter's preference for Alternative 2, Variation B Option 2 of this action has been acknowledged. This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.



SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015

Name: TINA MORENO

Address: 3126 SHEFFIELD AVE.

Phone Number: 323 476-8358 E-Mail: _____

COMMENTS: WHAT HAPPENS TO THOSE THAT GET EVICTION FROM CALTRANS BECAUSE OF CALTRANS NOT FIXING THE HOUSES. RAISING OF THE RENT WERE IM IN LOW INCOME.

CC-3-1

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**. Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

CC-3-1

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184. Per the 2012 audit, it was found that Caltrans passed up roughly \$22 million in rental income for these properties due to the fact that Caltrans failed to charge rents at the market rate for the majority of the properties. Therefore, Caltrans uses fair market rent determinations for all the properties and adjust the tenants' rents to fair market after providing them with proper notice.



CC-4



**SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015**

Name: MIKE RIVERA

Address: 5522 TEMPLETON ST.

Phone Number: _____ E-Mail: _____

COMMENTS: WHO/WHAT firm generated the
SRIA and DEIS Reports?

CC-4-1

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**.
Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

CC 4-1

Caltrans completed the Standardized Regulatory Impact Assessment (SRIA) and Draft Environmental Impact Report (DEIR). The names of the preparation team can be found in Chapter 9 of the environmental document.



SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015

Name: Candice Alviljar

CC-5-1

Address: 5523 Allan St.

Phone Number: (323) 226-1097 E-Mail: cannichol@yahoo.com

COMMENTS: AGAINST ANY FORM OF ACTION THAT WILL IMPACT COMMUNITY HOUSING; SUCH AS; TUNNELS, FREEWAYS, RELOCATING, EVICTING. I AM A SINGLE MOM W/ A DISABLED CHILD. WE CANNOT WITHSTAND ANYMORE HARDSHIPS SUCH AS; ENVIRONMENTAL,

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**. Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

RENTAL INCREASES & DISPLACEMENTS.

CC 5-1

The commenter's opposition to any action and/or project has been acknowledged.



CC-6



SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015

Name: Dr Tom Williams

Address: 4117 Barrett Rd LA 90032

Phone Number: 523-528 9682 E-Mail: _____

COMMENTS: Appendix G - Provide links for ALL Techn. Studies on the Initial Webpage as was done for DRIR

CC-6-1

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**. Comments can be mailed, or submitted online at www.710propertysalescomments.com. Sept 8

Please contact me with future updates about the project.

CC 6-1

All technical studies will be readily available upon request.



CC-7



SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015

Name: Dr Tom Williams

CC-7-1

Address: 417 Barnett Rd LA 90032

Phone Number: 323-528-9682 E-Mail: _____

COMMENTS: Fig 4-2 Shows Grifols Parking at 322 W Front
although Property is in the City of Los Angeles and is
connected to Grifols - Not in Alhambra.
Similarly 5600 Alhambra Ave. - Road named as "W. Mission Rd"
which is Alhambra City and incorrectly labelled Alhambra Av

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015.**
Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

in LACity

CC 7-1

Figure 4-2 Sheet 1 of 12 does illustrate that 3220 W Front St is in the city boundary of Los Angeles. With regard to the commenter's concern about the name of the street, W. Mission Road has been changed to Alhambra Ave.



CC-8



SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015

Name: NATALIA BACCHUS

Address: 926 JANE PLACE, PASADENA CA 91105

Phone Number: 949 878 6493 E-Mail: xaprata@gmail.com

CC-8-1

COMMENTS: IS IT CORRECT TO ASSUME THAT THE IMMEDIATE VICINITY OF THOSE PROPERTIES TO BE SOLD WILL ~~BE~~ NOT BE IN THE DIRECT LINE/BOUNDARY OF THE 710-TUNNEL? OR IN OTHER WORDS, WILL THESE PROPERTIES BE QUITE A DISTANCE AWAY FROM THE 710-TUNNEL (PROPOSED) LINE/BOUNDARY? (FUMES, POLLUTION CONCERNS)

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**.
Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

CC-8-1

Maps of the proposed tunnel for the SR-710 North Study can be found at http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/ under Project Alternative Maps

→ Caltrans Tenant soon to be relocated to:



411 E. Colorado Blvd.
Monrovia, Ca. 91016

SR-710 Surplus Property Sales

Draft Environmental Impact Report (EIR)

Public Hearings

August 6 & 10, 2015

CC-9



Name: Marie Ibsen Risigari - Gai

CC-9-1

Address: 534 Orange Grove Ave. S. Pasadena Ca. 91030

Phone Number: 626 676-5462 E-Mail: marieibsen@earthlink.net

COMMENTS: Please listen to Senator Roberti and implement his suggestions & pay attention to his comments. Uphold the pillars of the Roberti Bill and do whatever that can be done to preserve the community and keep relocation to zero impact.

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**. Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

CC-9-1

The Affordable Sales Program was created in accordance with the Roberti law, which legislates that, where possible, these properties be sold at affordable prices to low and moderate-income tenants. This legislation intends to preserve, upgrade and expand the supply of housing available to persons and families of low or moderate income in order to mitigate negative environmental effects caused by transportation projects.

CC-10

→ This Caltrans tenant (one of the 148) will soon be relocated to: 411 E. Colorado Blvd.
Monrovia, Ca. 91016



**SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015**

Name: Marie Ibsen Risigari-Gai

CC-10-1

Address: 534 Orange Grove Ave. South Pasadena Ca 91032

Phone Number: 626 676-5462 E-Mail: marieibsen@earthlink.net

COMMENTS: The area income should be used to qualify tenants and former tenants to qualify for the affordable sales and affordable rent program. Displacement of 148 families is unacceptable in the Great State of California. It is time to do what is right and just. The EIR should be sent to Caltrans and be postmarked by Monday, August 24, 2015.

Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

CC-10-1

The proposed regulation complies with current law. Government Code Section 54236(b) specifies how income should be determined. Caltrans based income determination on the best available information and upon the recommendations of the California Department of Housing and Community Development (HCD). A change to the government code would require legislation and cannot be made through this rulemaking process.



CC-11



SR-710 Surplus Property Sales Draft Environmental Impact Report (EIR) Public Hearings August 6 & 10, 2015

Name: Robert + Linda Cole

CC-11-1

Address: P.O. Box 1029 Studio City, CA 91614

Phone Number: 818-691-3693 E-Mail: bobc@bobalex@gmail.com

COMMENTS: We previously owned 833-825 Beate Dr. S. Pasadena 91030 until 1993. At that time CalTrans purchased the property after we renovated the property under hardship. Will we be able to repurchase the property from CalTrans? Who would we contact?

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**. Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project. How will pricing to qualifying be handled? Thank You.

CC-11-1

Information regarding the sales process can be found here:

http://www.dot.ca.gov/dist07/business/710sales/docs/FAQs_English_062615.pdf additionally,
questions regarding the Affordable Sales Process can be submitted here

<http://www.dot.ca.gov/dist07/business/710sales/710feedback.php> and will be responded to promptly.



CC-12



**SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015**

Name: RICKARD JOHANSSON

CC-12-1

Address: 5533 HUNTINGTON DR. N.

Phone Number: 626-679-4448 E-Mail: Treesim@gmail.com

COMMENTS: Alternative 2, variation B seems to be the only logical option. These properties needs to be sold to people that will properly take care of them. The entire community is suffering from the mismanagement of these properties.

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**. Comments can be mailed, or submitted online at www.710propertiesalescomments.com.

Please contact me with future updates about the project.

CC-12-1

The commenter's preference for Alternative 2, Variation B of this action has been acknowledged. Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184



CC-13



SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015

Name: Maria Crespo
Address: 4422 Maycrest Ave, Los Angeles, CA 90032
Phone Number: (323) 222-9431 E-Mail: N/A

COMMENTS:

Alternative 2; Variation B ^{Option 2} (2) is the preferred with the sale of homes being done immediately.

CC-13-1

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**. Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

CC-13-1

The commenter's preference for Alternative 2, Variation B Option 2 of this action has been acknowledged. This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.



CC-14



**SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015**

Name: VICTORIA SANDOVAL

Address: 4426 MAYCREST AVE, LOS ANGELES, CA 90032

Phone Number: (323) 803-9956 E-Mail: ELS710@yahoo.com

CC-14-1

COMMENTS: The 148 who ARE BEING RELOCATED SHOULD BE MADE CLEAR ON WHY. YOUR ANALYSIS IS UNCLEAR WITH REGARD TO 148 AFFECTED.

ALTERNATIVE 2; VARIATION B^{opt} (B~~2~~) SHOULD BE IMPLEMENTED SO THAT HOMES ARE SOLD IMMEDIATELY TO THE TENANTS.

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**. Comments can be mailed, or submitted online at www.710propertysalescomments.com.

CC-14-2

Please contact me with future updates about the project.

CC-14-1

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties.

As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow= 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

CC-14-2

The commenter's preference for Alternative 2, Variation B Option 2 of this action has been acknowledged. This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.



CC-15



SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015

Name: Joie Broomis
Address: 1116 1/2 Maple Street
Phone Number: 818 731-1004 E-Mail: Joie.Broomis@live.com

CC-15-1

COMMENTS: I had filled out a application for residential Rental
This application was sent back to cal-trans on 3-1-2002 + no
response was received back from caltrans to me. I have made
numerous phone calls, over the years + have gotten no response. I wanted
affordable housing with the intent to buy - Please respond ASAP
I have my copy of the Residential Rental application -

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**.
Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

I will send you a copy of this application once I am contacted.
Joie Broomis

CC-15-1

Information regarding the sales process can be found here:

http://www.dot.ca.gov/dist07/business/710sales/docs/FAQs_English_062615.pdf additionally,

questions regarding the Affordable Sales Process can be submitted here

<http://www.dot.ca.gov/dist07/business/710sales/710feedback.php> and will be responded to promptly.



CC-16



SR-710 Surplus Property Sales
Draft Environmental Impact Report (EIR)
Public Hearings
August 6 & 10, 2015

Name: Mark Ng

Address: 3533 Chadwick Dr. Los Angeles, CA 90032

CC-16-1

Phone Number: (323)223-5118 E-Mail: markng68@yahoo.com

COMMENTS: I submit my comments on the SF-710 Surplus Property Sales Draft EIR on behalf of my neighbors in the El Sereno area. My neighbors should have the opportunity to purchase the surplus parcels. Therefore I propose Alternative 2 - Action Alternative; Variation B - Immediate Sale with Option 2.

Comments on the Draft EIR should be sent to Caltrans and be postmarked by **Monday, August 24, 2015**. Comments can be mailed, or submitted online at www.710propertysalescomments.com.

Please contact me with future updates about the project.

9/8/15
RECEIVED

CC-16-1

The commenter's preference for Alternative 2, Variation B Option 2 of this action has been acknowledged. This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

**TRANSCRIPT NO. 1 FROM THE AUGUST 6, 2015, PUBLIC
HEARING**

Transcript No. 1 from the August 6, 2015, Public Hearing	
T1-1	Don Jones
T1-2	Dr. Tom Williams
T1-3	Micheal "Mike" Rivera
T1-4	Elisa Almeida
T1-5	Michelle Garcia
T1-6	Patrick Garcia
T1-7	Jennifer Maldonado
T1-8	Yvonne Rodriguez
T1-9	Hugo Garcia
T1-10	Joe Cano
T1-11	Therese Hernandez
T1-12	Linda Krausen
T1-13	Maria Miranda
T1-14	Nora Verdesoto
T1-15	Christopher Sutton
T1-16	Victoria Sandoval
T1-17	Maria Crespo
T1-18	Elisa Almeida
T1-19	Linda Krausen
T1-20	Christopher Sutton
T1-21	Don Jones

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

STATE ROUTE 710 SURPLUS PROPERTY SALES
PUBLIC HEARING
Los Angeles, California
Thursday, August 6, 2015

Reported by:
NATCHEZ FOWLER
CSR No. 13913

Job No. 2111184
PAGES 1 - 71

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

STATE ROUTE 710 SURPLUS PROPERTY SALES PUBLIC
HEARING, at 2241 North Eastern Avenue, Los Angeles,
California, beginning at 6:16 p.m. ending at 8:04 p.m., on
Thursday, August 6, 2015, before NATCHEZ FOWLER, Certified
Shorthand Reporter No. 13913.

1 Los Angeles, California, Thursday, August 6, 2015

2 6:16 p.m.

3
4 MR. BRITT: All right. Evening. Can everyone hear
5 me? I think I'll just hold this. If you want to grab a
6 seat we're going to go ahead and get started. While
7 everyone is grabbing a seat, I just want to make sure that
8 everyone is signed in. If you haven't signed in, please
9 take the time to do that before you leave. That will help
10 us to document everyone that's here and have you on our
11 data base. I want to make sure that everyone had an
12 opportunity to grab a fax sheet. So there was materials
13 when you walked in that looked like this, has information
14 about the project that's very useful and also contact
15 information that's also helpful.

16 If you would like to make a comment tonight, we do
17 have a speaker card that looks like this, it's green. You
18 will need to fill this out and we'll collect these and
19 then we'll make the announcement at the end so that people
20 can speak and get your opportunity to do that.

21 We also have a white card that looks like this,
22 which is actually a comment card. So if you would like to
23 just handwrite a comment and not actually make a verbal
24 comment, you're able to do that. And we have a comment
25 box in the back on one of those blue tables where you can

1 just leave it behind. There's also a return part that if
2 you wanted to take it home and think about it, you can
3 mail it back in and it will get to the right place if you
4 send it in.

5 So those are the items. We do have refreshments in
6 the back. There is restrooms out these doors on the left,
7 on my left or on your right which go into the main
8 sanctuary where the restrooms are located. So with that
9 we are going to go ahead and get started with our
10 presentation.

11 You should be here tonight for the SR-710 surplus
12 property sales draft environmental impact report. And
13 tonight we're going to have one of our two public hearings
14 that are going to be taking place. The first is tonight
15 and the second one is August 10th.

16 My name is Chester Britt, I'm with Arellano
17 Associates. We are part of a project team, LSA is the
18 lead consultant. We are working with Caltrans and tonight
19 you're going to be hearing from Ron Kosinski. Ron, if you
20 could raise your hand. He's director of environmental
21 affairs at Caltrans. And then Allison Morrow, she's the
22 project manager for the project.

23 I also have, with our staff, Raul Velasquez who is
24 up here in the front. He'll be walking around collecting
25 the speaker cards during the meeting. So if you want to

1 speak just waive it and he'll walk around and grab it from
2 you. From LSA we have King Thomas who's in the back, he's
3 in the blue shirt waving his hand. He's the lead for LSA,
4 the technical consultant. And then Ryan Bensley who is
5 also in the back in the white shirt waving his hand at us
6 as well.

7 So you'll be hearing from all of us. We'll be
8 staying here after the presentation as well by the boards
9 to help you understand what's on the boards; if you have
10 questions or if you'd like to ask some clarifying items in
11 relation to the information.

12 So that's our welcome and our introduction. We also
13 have -- actually let me just mention Julio Torres from
14 counsel member Jose gist arrest's District 14. Julio, are
15 you here? Way in back in the white shirt. Raise your
16 hand one more time so we can see you. There you go.

17 So welcome, thank you for coming. So what are we
18 going to be doing tonight? Tonight is a public hearing as
19 I mentioned for the 710 surplus property sales. We're
20 going to provide an overview of the proposed action.
21 There is an environmental document which I mentioned is
22 back on that blue table next to the comment box. You're
23 able to look at that document both here physically and
24 also online in selected locations. We'll give you an
25 overview of the proposed action that's in that document

1 and you'll be able to understand that.

2 We're also here to explain the environmental review
3 process. This is a formal proceeding and we will have a
4 court reporter here and when it's time to take comments,
5 he will be transcribing all of the comments and we'll get
6 a report from all the comments. And all the comments are
7 that are received both verbal and also the written
8 comments are going to be compiled and become part of the
9 final environmental document and those comments will be
10 replied to or responded to in that final document. And
11 then, also, we explained a little bit about the public
12 comment process as we go along.

13 So what is the purpose of today's meeting? Well,
14 the number one purpose is to provide information. So we
15 have, as I mentioned, a variety of boards, we have the
16 document, we're going to have a powerpoint presentation
17 which we'll be going through right now; and that will give
18 you information as to what is this project, what is the
19 process, what are the alternatives, what are the
20 environmental summary impacts that are found in the
21 document, and we'll be giving you that information.

22 So tonight you should be learning something if you
23 are interested in the project which you are because you're
24 here; you're going to be finding information out. The
25 second item is to describe the environmental review

1 process and the subsequent decision making. Many times,
2 when we come to meetings like this people ask the
3 question, well, who makes the decision and when is the
4 decision made? So you'll be learning about that process
5 today. We are under environmental law and so there is a
6 process to be followed and we'll be explaining that.

7 And then thirdly, we're here to solicit input from
8 you. So we want to hear from you and we want you to
9 either do that verbally if you feel comfortable doing that
10 or if you would rather write it down, you can write that
11 down and send it to us. And we want to know issues and
12 concerns related to the project, including any information
13 that you might have about the alternatives and any of the
14 mitigation matters that are being proposed.

15 When we get to the oral comment section it will be
16 after the presentation. Members of the public will be
17 able to provide comments. As I mentioned, we'll call your
18 name, you'll come up and we'll have a microphone where you
19 can make your comment.

20 As I mentioned you need to fill out a speaker card
21 and we'll call you out three at a time so that you can
22 queue up and we'll be respective of each other's time.
23 We'll allow for three minutes for you to make your
24 comments so that you have plenty of time to say what you
25 need to say. And then we're asking that you don't share

1 your time with other people. So if we get through the
2 round of comments and you still want to make another
3 comment, you can come back up and make another comment.
4 But for the sake of being respectful of everyone's time,
5 we'll start off with three minutes each.

6 So with that, I'm going to bring up Ron Kosinski and
7 he's going to give you an overview.

8 MR. KOSINSKI: Thank you, Chester.

9 Hello, my name is Ron Kosinski I'm the deputy for
10 environmental planning with Caltrans. And we're here
11 today to talk about the potential sale of the properties
12 along the 710 route.

13 The route that we have these houses on, we started
14 buying properties on those about 50 years ago. So in the
15 60s and 70s, we started to buy properties and that's when
16 we introduced this proposed project to the community.
17 There's a variety of properties over 460 I think is the
18 total number. And they're in Pasadena, South Pasadena and
19 El Sereno.

20 Currently, what we're here today for is when we
21 identify these properties as no longer being needed; to
22 find a process that we have to sell those properties as
23 excess. The purpose and need of the project is to sell
24 these properties as I mentioned, especially the properties
25 that are not impacted by any of the project alternatives.

1 In terms of the construction, transportation
2 construction project there's a variety of alternatives
3 that impact a variety of properties; so as they're making
4 the decision on what to do about that project, the
5 construction of a transportation improvement project,
6 they'll be making a similar decision on how to sell the
7 properties that are no longer needed for those
8 alternatives. This action is intended to provide
9 affordable housing which is another need for this project
10 and to remove Caltrans from the project management role.
11 Caltrans is a transportation agency, really is not that
12 well equipped to manage these houses which we've had for
13 50 years or so. And so we'd like to extricate ourselves
14 from that responsibility.

15 And lastly, as noted here, the sales includes the
16 need to comply with senate bill that was passed -- which
17 I'll chat about in a little bit -- the Roberti bill and
18 affordable sales bill as well as the streets and highways
19 code.

20 The study area, obviously, is dealing with basically
21 south of the 210 and north of the 10 freeway. There's,
22 again, the houses primarily in Los Angeles, there's close
23 to 300 of these houses in the El Sereno area in the City
24 of Los Angeles. So that's where the major portion of
25 these properties are. There's some in Pasadena and a

1 lesser amount in South Pasadena. But that's basically the
2 study area that we're talking about in terms of selling
3 these houses.

4 Now, in legislation and regulations. In October of
5 2013 I think it was -- 2013, Governor Brown signed SB 460
6 which basically said it's time to declare these properties
7 excess and to sell them at affordable rates to eligible
8 tenants. And then through some kind of an entity where
9 that would go through the process of going through the
10 escrows and identifying the potential persons buying it,
11 making sure the various regulations that are adopted are
12 followed.

13 So that's really one element of that. The other one
14 is that as we're selling these houses, some of the funds
15 will be set aside to assist in an account that would be
16 helping with repairing the single family houses that are
17 sold to low and moderate income individuals.

18 Another bill that's mentioned periodically is the
19 Roberti bill. I think it's from about 1980, '84,
20 something like that which was a bill that also kind of
21 identified how the state should be selling properties.
22 That was pretty much focused on route 2 at the time, but
23 also applied to this location.

24 And the affordable sales program and that's a
25 separate piece of legislation that there are -- I should

1 point this out -- there are regulations that are being
2 adopted. We're here today not to talk about those
3 regulations. There's a separate process for you to input
4 into that. They've had community meetings and things out
5 here to solicit input on that. So this meeting is really
6 about what are the impacts of selling these houses and the
7 process that would be taking place. So that the
8 regulations are on a separate track, please keep that in
9 mind and I think it's kind of confusing. It's certainly
10 confusing to me. There's regulations and then there's
11 environmental document. So we're here today to talk about
12 the environmental document and the impacts of the sale on
13 the community.

14 There's basically two basic alternatives that we
15 have. One is just, let's just continue what we're doing.
16 Caltrans keeps these houses, we don't take any action, we
17 don't sell the properties and just kind of manage them the
18 way we're doing. So there would be no change under
19 alternative one to what's happening today. There are
20 issues associated with that.

21 Alternative 2 has a couple options and variations on
22 how to do this. The sale of the property under
23 alternative 2 variation 1 option 1 is to sell these houses
24 over a five year period. So it's a gradual sale of the
25 properties. And that would be -- under that option we

1 have the option then of retaining the subsurface rights
2 for a future tunnel within that corridor. So again,
3 variation A is sell the properties gradually over a five
4 year period and keep the subsurface rights as a part of
5 that sale.

6 With variation A option B they're selling the
7 properties over that same five year period, but you're
8 also selling and conveying the subsurface property rights.
9 So that's option 2 with that variation.

10 And then we have variation B. Variation B basically
11 is, let's sell all these properties as quickly as
12 possible, as fast as we can, immediately; with the same
13 two options I just articulated. So we sell these
14 immediately with option 1; we would retain the subsurface
15 rights; we'd sell these properties immediately. But with
16 option 2, we would convey those property subsurface rights
17 with the parcels that we're selling.

18 So I know that's a little bit difficult to
19 understand and they maybe made it too complex. But we
20 felt it was important those issues and those variations be
21 include as part of this process.

22 So with that, I'm going to stop my presentation and
23 pass this over to Allison for the environmental
24 implications that we've discovered up to now, Allison.

25 MS. MORROW: Thank you. Good evening, I'm

1 Allison Morrow. I'm a senior environmental planner for
2 Caltrans and I oversaw the preparation of this draft
3 environmental impact report. So I'm going to talk a
4 little bit about the process and some of the our findings.

5 So, essentially, the purpose of the DEIR is it's
6 largely a disclosure document; in which, we discuss a
7 project or in this case an action and an analysis of its
8 effects on people and the environment. We also include
9 ways we can possibly minimize or mitigate these effects.
10 So here is kind of a graphic on where we are in the
11 process.

12 Last year in June, we noticed our intent to prepare
13 a DEIR for this action. Since then, we have been
14 conducting studies and conducting our analysis and
15 released the DEIR on July 10th. We originally planned for
16 a 45 day review period and we have since extended that to
17 September 8th, 60 days. We are currently at hearings, if
18 you were wondering. We have one today and we have one on
19 Monday in Pasadena.

20 And then after we close our review period, we will
21 gather all our comments, we will respond to those comments
22 and we will choose a preferred alternative and prepare our
23 final environmental document later this year hopefully.

24 So here's a quick list of the some of the topics we
25 evaluated in this document. They include land use,

1 community factors, relocations, growth, cultural
2 resources, hazardous waste and cumulative effects.

3 So a quick summary of some of our findings in the
4 DEIR which as has been said before you can find in the
5 back if you need more detail.

6 Under the no action alternative, there could be
7 potentially significant impacts to local plan consistency.
8 These could be avoided or mitigated if the respective
9 agencies, Pasadena and South Pasadena, amended those plans
10 to reflect that the properties would not be sold. And,
11 again, that's under alternative one, the no action
12 alternative; if we were not to sell these properties.

13 Under alternative 2, and this is the case for all
14 variations and options that Ron just went through, there
15 are potential impacts to community character that could
16 occur due to some displacement and subsequent new owners
17 taking residence in those homes. We do anticipate that
18 these impacts are going to be less than significant as the
19 separate but parallel affordable sales program regulations
20 are being developed to afford tenants every opportunity to
21 purchase their residence.

22 So also under alternative 2, all variations and
23 options, we do believe that less than significant impact
24 with regards to relocations would occur because we do
25 believe there are a sufficient number of residential

1 replacement properties for those that are displaced in
2 this area. In terms of growth-inducing impacts, we don't
3 believe that any growth-inducing impacts would occur. The
4 sale would not result in the need to expand any public
5 services, it wouldn't encourage or facilitate any economic
6 development, it wouldn't involve any precedent setting
7 actions that could result in any kind of growth.

8 Again, continuing with alternative 2, we do believe
9 there may be a low potential for adverse impacts to
10 cultural resources that could result in a significant
11 effect. Some of these properties out there are historic
12 homes and they are considered historic resources. And so
13 our intent is to sell any of these historic resources with
14 protective covenants in place that would avoid impacts to
15 these properties. They covenants would help those
16 properties retain that that makes them historic and they
17 would be held in perpetuity. There is a small possibility
18 that in the unlikely event that we cannot locate a buyer
19 for a historic property, we would have to -- because of
20 the presence of a covenant -- we would remove the covenant
21 in order to sell the property. This could cause an
22 adverse effect to that historic resource. And that could
23 also potentially contribute to a cumulative impact. And
24 then, finally, we do believe that less than significant
25 impacts with incorporation and mitigation with regards to

1 hazardous waist may occur. This is due to the fact that
2 many of the potential surplus properties could contain
3 asbestos containing materials, lead-based paint, you know,
4 generally the things you find in older properties. But we
5 do not believe they would pose a risk if they are handled
6 and disposed of properly as we outlined in the DEIR. And
7 now I'm going to hand it back over to Chester.

8 MR. BRITT: Thank you Allison. So as I mentioned,
9 we are going to be taking public comment. We would ask
10 that you focus your comments on environmental concerns.
11 The benefit of the comments, as you've heard, is that the
12 environmental team will be required to look at each of
13 those comments and respond to them as part of the final
14 environmental document. So please keep your comments
15 focused on issues related to the document if possible.

16 The comments must be received or postmarked, as you
17 heard by Allison, no later than September 8th. There was
18 a previous date of August 24th which it got extended; that
19 used to be 45 days and now its 60 days. So September 8th
20 is the date and if you're going to be mailing, for
21 example, this back to us we would need to have it by then.
22 Obviously, if you make a comment tonight, you're in that
23 timeframe and there's no problem. You can also submit
24 your comments by filling out a comment form, I mentioned
25 that, and submitting it at this meeting or mailing it

1 back. You can mail letters to Ron Kosinski who previously
2 spoke and here is his address as well.

3 There's also the ability to make comments online.
4 This should be in the documents that we handed out and you
5 can also see it here on the screen. If you go to this
6 location, 710propertysalescomments.com you'll have the
7 ability to make a comment.

8 I would like to point out that in the back on my
9 right or your left is a series of laptops that are set up.
10 For this project Caltrans has hired a company that does
11 smart comment which allows you to provide a comment
12 online. And that will help the environmental team be very
13 efficient as they gather all the comments and then go
14 through the process of replying to each comments, that
15 they'll be categorized appropriately and they'll be in the
16 system. So it's a very efficient way to do it. You can
17 go and sit down tonight and type your comment in and
18 you'll be done. You can also go online to this location
19 that I mentioned earlier and you can also do that. And
20 that's just an easier way for those that feel comfortable
21 using computers and would like to take advantage of that.
22 And then, finally, the oral comments as well.

23 So with that, I'm going to read off the few comment
24 cards or speaker cards that I have. If you would like to
25 make a comment, again, Raul's going to be walking around,

1 he'll collect that.

2 As I read your name, please come up to this
3 microphone. We do have the court reporter here, so I
4 would ask that you state your name for the record. Even
5 though I'm calling your name, if you could state your name
6 so the court reporter will get you saying it, that will be
7 great.

8 And then there will be a timer that will appear on
9 the screen that will show three minutes. It will just
10 count down, there's no buzzer or something. We don't have
11 very many people so we're not going to be extremely
12 rigorous, but we would ask that you be respectful of
13 everyone's time in making your comment.

14 So the first person I have is Don Jones and then
15 Joe -- looks like Salas. And then Dr. Tom Williams. So I
16 have Don Jones, Joe Salas and Dr. Tom Williams.

17 MR. JONES: My name is Don Jones. I'm with the No
18 710 organizing committee and the Caltrans Tenants
19 Association and United California Tenants Association as
20 well.

21 I'm here to speak on behalf of Senator David Roberti
22 who apologized that he can't be here today, but he will be
23 with us on Monday in Pasadena. It's interesting that they
24 show the Roberti bill legislation up there; but I asked
25 the senator, did anybody ask you anything about this,

1 senator? He said no one asked me. I said in the
2 environmental impact document and he said not in my name.
3 So I'd like to read his comments to you.

4 "My name is David Robert and I served in the
5 California State Senate from 1981 to 1993. I will be here
6 today with the citizen of El Sereno, Pasadena and South
7 Pasadena who are facing a major housing problem that needs
8 your urgent attention. In the 1960s the California
9 Department of Transportation as part of the 710 reroute
10 approval acquired properties in the communities of
11 El Sereno Pasadena and South Pasadena under eminent
12 domain. These properties would have been demolished for
13 the expansion of 710 freeway, displacing hundred of
14 residents, bringing crime, hazardous pollution and
15 dividing these historic neighborhoods.

16 Thanks to the hard work and perseverance of those
17 communities, the Caltrans Tenants Association, the UCT
18 association and community groups, the 710 extension
19 project was not completed, but their struggle continues
20 over the now surplus properties. In 1979 the California
21 legislature adopted the Roberti bill. The Roberti bill
22 emphasized the shortage of decedent, safe and sanitary
23 housing which persons or families of low or moderate
24 income can afford and requires surplus properties to be
25 offered to existing occupants at affordable rates.

T1-1-1

T1-1-2

T1-1-3

1 According to the Caltrans 2015 draft environmental impact
2 report, Caltrans intended to sell these surplus properties
3 to 'provide needed affordable housing.' However, Caltrans
4 has been neglecting them, allowing these properties to
5 fall into disrepair, bringing blight to these communities.

T1-1-4

6 A 2012 state audit report calls Caltrans property
7 management poor, something the residents of these
8 communities have affirmed for years.

T1-1-5

9 In addition to failing to perform annual property
10 inspections, resolve major inhabitability issues such as
11 mold and earthquake damage, Caltrans has been unable to
12 demonstrate that the repairs performed were necessary,
13 reasonable or cost-effective. Caltrans has served
14 numerous eviction notices to these tenants. And it's in
15 draft relocation impact report it has identified 148
16 households that will be displaced by the surplus property
17 sales.

T1-1-6

18 While the impact report has been unavailable for our
19 review, previous relocation initiatives for the 710
20 properties have been identified particularly problematic
21 for residences that are already overcrowded. This will
22 effect the elderly, low income, ethnic minorities, those
23 who do not have access to private vehicles and disabled
24 residents. This represents many of the residents of
25 El Sereno, Pasadena and South Pasadena. I cannot allow

T1-1-7

1 that to happen, not in my name." Thank you.

2 MR. BRITT: Thank you. Okay. So we have Joe Salas
3 and Dr. Tom Williams. Is Joe here? Joe going once? What
4 was that?

5 No comment. Okay. Dr. Tom Williams and then we
6 have Mike Rivera.

7 DR. WILLIAMS: Good evening, Dr. Tom Williams.
8 LA 32 neighborhood counsel board member, Sierra Club
9 transportation board member and a few others.

10 The basic element, is this the right way to go?

11 First off, let's have an extension until, say,
12 September the 28th because it's very confusing documents.
13 And, in fact, when you have the technical reports
14 separated from the references, we don't know who's on
15 first and which ones take priority.

16 Therefore, okay, first thing, the no action
17 alternative. Another 20 years of Caltrans management of
18 these properties; God help us. Based upon the last 30
19 years that I know of and there were those before me, it's
20 not a good deal and it should be changed from no action to
21 future without project or future without other actions.

22 As part of the extension, we'd also like to have an
23 outreach meeting in South Pasadena. They're one of the
24 three, right?

25 Okay. There's also an issue as to, did anyone

T1-1-7

T1-2-1

T1-2-2

T1-2-3

1 actually find the announcement for this meeting and
2 Monday's meeting on the Caltrans webpage? I went through
3 searching for over a half hour and it's not listed as an
4 event, it's not on the calendar, it's not what's new. So
5 very poor outreach. How did anyone actually find out
6 about it? We didn't have enough handouts yesterday at the
7 neighborhood counsel board member meeting and we didn't
8 have them this morning at the senior's club meeting. So
9 it's difficult to find out what's going on.

T1-2-4

10 Having some experience, why do you have to have the
11 subsurface property when you don't even know where the
12 line is going to go? Because we've already put in to EIR
13 last night that they need to relocate the entire tunnel
14 alignment to a much quicker, faster, cheaper way.

T1-2-5

15 So can we separate out everything north of Templeton
16 should be sold immediately? And oh, by the way the SB
17 14 -- 4118 I guess it was and Roberti didn't give a five
18 year program for sales; they said do it. So why isn't
19 that an alternative? Do it immediately and that should be
20 the base case based upon the rules or the regulations and
21 such.

T1-2-6

22 We're also concerned -- oh, has anyone considered
23 the property tax impacts of this project on LA, South
24 Pasadena and Pasadena? Those are not addressed either, as
25 to would it be continuing for another 20 years under the

T1-2-7

1 no action? So we're looking alternate several different
2 views and we will be submitting them online.

3 The problem with your online is: It has a megabyte
4 limit on uploading. And it also has a loss of all
5 formatting in the direct inputs. So it's a trash input
6 page. I would highly recommend somebody improve it so
7 that's it's more user-friendly and accept MS Word
8 documents. Thank you.

9 MR. BRITT: Thank you. Okay. The last speaker card
10 that I have is Mike Rivera. So if anyone else would like
11 to speak?

12 Raul, can you just grab that.

13 No, tonight is public hearing. So we're not going
14 to do question and answer. So go ahead and state your
15 name.

16 MR. RIVERA: Good evening. My name is
17 Michael Rivera and I'm a Caltrans tenant since 1971. I
18 just have a comment to make regarding the studies. And
19 that is, who are the people that actually did these
20 studies?

21 You know, from a comment point of conversation, we
22 don't know who they are. I mean, if it was done by
23 Caltrans, it's not specified and I just went through it
24 and wrote down a bunch of information regarding the
25 studies. But it doesn't say their qualifications, if they

T1-2-7

T1-2-8

T1-3-1

T1-3-2

1 were qualified to do these studies, it has no background;
2 it just basically says done by Caltrans. And I'm really
3 curious as to, were they even qualified to do these? Do
4 they have the ability to do these properly where we can
5 understand them? But, you know, it's a matter of
6 transparency. And that needs to occur before we can
7 really trust these reports, because normally these reports
8 take years to get done. Anybody can look in Los Angeles
9 Times or various newspapers or news sources and see what
10 happens with these environmental studies and how long they
11 normally take. And to have this done in such an expedited
12 manner, some people are going to say, well it's up to
13 question.

14 You know, it's like, how did you get it done that
15 fast? So there needs to be a better transparency as far
16 as the qualifications of the people; were they the right
17 people to do it; should you have outsourced it to a
18 company that is a third party where they didn't have any
19 skin in the game; therefore, they can give an absolutely
20 honest report regarding both of these reports.

21 So it's the kind of thing that, because of things
22 that have happened in the past with all of us tenants
23 regarding, like, we got roofs replaced at such an
24 unbelievable cost that the that contractors told us about
25 and then to have this occur, you know, we've got to

T1-3-2

T1-3-3

T1-3-4

1 question it. And we need to understand what's going on.
2 People came up to replace my roof and it didn't leak. And
3 I've had a broken window for almost two years that they
4 won't replace. It's just a small window. It's like 18 by
5 20. And I've seen vacant houses get exorbitant repairs
6 done to them, but yet my agent who does the yearly home
7 inspection says we don't have the money to fix your
8 window. Well, you know, something's up.

T1-3-4

9 So let's try and be a little more transparent on
10 this. We'd like to work with you, I'm sure you'd like to
11 work with us. Because after all, we're the taxpayers,
12 we're the ones putting the money out there. So there
13 needs to be a better line of communication. Why some
14 things are happening, why some things are not happening.
15 Like I say, fixing up vacant houses but you can't fix a
16 broken window. What's up with that?

T1-3-5

17 So if we can get a little bit more honesty and
18 transparency going to allow us to examine the documents;
19 to allow us to examine the people who generate the
20 documents, maybe then we can turn around and have a little
21 more faith in what you're proposing to us as far as the
22 sales program. Because that creates doubt on that. One
23 doubts leads to another doubt, leads to a third doubt,
24 leads to a fourth doubt, leads to a fifth doubt in this
25 never ending chain. And that's my comment for tonight.

T1-3-6

1 Thank you.

2 MR. BRITT: Thank you. All right. So we've got
3 some more comments. So it looks like Elisa Almeida. And
4 then she'll be followed by Michelle Garcia and
5 Patrick Garcia. Just state your name. Thank you.

6 MS. ALMEIDA: Hi, Elisa Almeida. Tenant, resident
7 of El Sereno, 30 years. I just want to add to something
8 the young man just said about being tax payers. We're the
9 ones that pay the rent. We're the ones that do everything
10 for the house. And as far as taxes, in case a lot of you
11 don't know, Caltrans does not pay taxes on these homes.

12 Okay. My comment card is in regard to the impact of
13 the community of Caltrans tenants. It would affect the
14 historical homes. On the PDF file it says there's only 10
15 homes in El Sereno. That's wrong. Just on my block
16 alone, Sheffield, up to Norwood [sic], I counted eight.
17 And if I go further, I'm sure I'll count eight more. And
18 if I go around the corner, all the way to Stockbridge I'm
19 sure I'll find eight more. Right? Okay. He knows.

20 So that in itself, those historical homes, they're
21 also not being taken care of. So that makes a big impact
22 to our community. Because there's craftsmen in South
23 Pasadena, Pasadena but we have them too. We have
24 Saint Ann's, we have all kinds historical homes that are
25 not being made that way anymore. So this needs to be

T1-4-1

T1-4-2

T1-4-3

1 addressed too, in the historical site.

T1-4-3

2 Do I do my other comment card or do I wait?

3 MR. BRITT: Yeah. Do both.

4 MS. ALMEIDA: So I have to read my name again?

5 Everybody knows me.

6 Okay. Who, when -- and not what -- but why are you
7 not disclosing these 148 people -- households? Yes,
8 households.

T1-4-4

9 What I read on that PDF file, it doesn't tell me who
10 they are, where they live, I mean, for all I know, it
11 could be me. Again, we're living in limbo. That's how
12 we've been living, in limbo. And I think everybody in
13 El Sereno agrees with that. We don't know what you're
14 going to do, we don't know when you're going to do it,
15 you've had plenty of time to disclose it but you don't do
16 it, plenty. So that, I say, therefore, we need 90 days,
17 not 60 days, 90 days so we can do our own research to find
18 out who what and why.

T1-4-5

19 Now, on outreach, I know that's not environment, but
20 as a senior advocate, I think your outreach is terrible.
21 Terrible. Because in our community, the councilmen is
22 only allowed 199. I don't know how many papers you're
23 allowed to send out, but all these people that live there
24 have already been living there over 30 years they own the
25 damn house. Excuse me, they own their houses. Okay?

T1-4-6

1 So I think that you should look on everybody's
2 spreadsheet, who's been living there the longest and send
3 them a letter, not a file, they don't have computers. I
4 have to go into their house and explain what I read on
5 that CD-thing. So you need to send letters to these
6 seniors, 37 years, 40, 40-some years, 63 years, come on.
7 Your outreach is terrible. For Metro, for Caltrans, we
8 need better than that. Yeah. Okay. You have your
9 websites and all that. So that means I have to go to
10 everyone with my laptop and explain everything. That's
11 not right. Most of my street are seniors, including me.
12 Okay. And they don't even have the skills to use the
13 computer even if they did have one. So they have to call
14 their children, they have to call me, they have to -- or
15 their children are calling me to find out. So okay. I
16 vented.

17 MR. BRITT: Thank you. Michelle Garcia followed by
18 Patrick Garcia.

19 MS. GARCIA: Hello. For the record, my name is
20 Michelle Garcia.

21 The date is August 6th, 2015. This letter is to
22 Mr. Ron Kosinski, Deputy District Director, Caltrans
23 District 7, division of environmental planning, 100 South
24 Main Street, MS-16, Los Angeles, California 90012.

25 CC to Mr. Jerry Brown, Governor, Ms. Kamala Harris,

1 Attorney General, Mr. Malcolm Dougherty, Caltrans
2 Director, Mr. Brian Kelly, Acting Secretary of the
3 California Business, Transportation and Housing Agency,
4 Ms. Carrie Bowen, Director, Caltrans District 7,
5 Mr. Brent Green, Chief, Division of Right of Way and Land
6 Surveys, Mrs. Jennifer Lowden, Assistant Chief, Division
7 of Right of Way and Land Surveys.

8 "Mr. Kosinski,

9 This letter is written on behalf of the United
10 Caltrans Tenants (UCT) residing primarily in the community
11 of El Sereno. UCT was formed on December of 2012 in the
12 wake of Caltrans' ill-conceived imposition of rent hikes
13 and initiation of the revamping of Caltrans' Affordable
14 Rent Program Regulations. UCT remains particularly
15 concerned about some recent developments related to the
16 process involving Affordable Sales Program Regulations and
17 the Draft Environmental Impact Report (DEIR). Following
18 are circumstances related to our concerns:

19 "On July 1st, 2015 Caltrans issued El Sereno
20 Caltrans residents affordable sales regulations and the
21 standardized regulatory impact assessment related the
22 State Route SR-710 surplus property sales. El Sereno
23 residents are unable to comprehend the legal and technical
24 jargon contained in these documents.

25 "On July 7th, 2015 Caltrans issued El Sereno

1 Caltrans residents a Caltrans draft environmental impact
2 report CD related to the SR-710 surplus properties sales.
3 In addition to documented evidence that not all Caltrans
4 tenants received the CD, all tenants, without exception,
5 that have self reported to UCT, state that they are unable
6 to comprehend the legal and technical jargon contained in
7 the CD."

T1-5-2

8 MR. BRITT: Thank you. Patrick Garcia. And then
9 after Patrick we are going to have three more people which
10 is Jennifer Maldonado, Yvonne Rodriguez and Hugo Garcia.

11 MR. GARCIA: So I'm reading page two of the
12 letter --

13 MR. BRITT: I'm sorry. Could you just state your
14 name.

15 MR. GARCIA: My name is Patrick Garcia, I'm with
16 UCT. And this is page 2 of the letter directed to
17 Mr. Ron Kosinski.

18 "Furthermore, monolingual Spanish-speaking Caltrans
19 residents in El Sereno are even more severely impacted, as
20 they were not provided with a Spanish language DEIR CD.
21 Roughly 50 percent of the households in El Sereno contain
22 monolingual Spanish speaking heads-of-households. In
23 essence, the substantial immigrant population of Caltrans
24 residents in El Sereno is being ignored and denied
25 information that has been provide today other Caltrans

T1-6-1

1 residents. UCT believes that this differential treatment
2 points to institutional racism directed and amounts to de
3 facto discrimination directed toward the Latino class of
4 Caltrans residents from El Sereno.

5 "Because the Caltrans residential community in
6 El Sereno is unable to assimilate or comprehend the legal,
7 technical and English-only jargon contained in the
8 aforementioned documents the community is unable to
9 effectively or meaningfully comment and participate in the
10 community engagement process related to the Caltrans draft
11 environmental impact report (DEIR) State Route 710
12 (SR-710) surplus properties sales.

13 "Caltrans has not taking the opportunity to conduct
14 substantive DEIR information sessions in the community of
15 El Sereno to educate the community on the DEIR. In the
16 July 7, 2015 notice to the community announcing the
17 August 6th, 2015 and August 10th, 2015 public hearings
18 Caltrans concedes the following, 'The meetings will
19 include a brief presentation and then an opportunity will
20 be provided for individuals to speak and provide formal
21 comments.' So it's clear that these public hearings will
22 not substantially educate the community on the DEIR. Most
23 particularly, the monolingual Spanish-speaking residents
24 will assuredly be ill prepared to understand the
25 proceedings and make an informed public comment because

T1-6-1

T1-6-2

T1-6-3

T1-6-4

1 Caltrans has failed to inform them in a linguistically
2 appropriate manner. Caltrans has made available a DEIR
3 hard copy for review at El Sereno library in English only.
4 Caltrans has made a frail and slighting attempt to comply
5 with APA (Administrative Procedure Act) by only
6 translating the cover letters. What the logic in
7 translating the cover and not translating the main
8 document?" Thank you.

T1-6-4

9 MR. BRITT: Thank you. Next, we have
10 Jennifer Maldonado followed by Yvonne Rodriguez and
11 Hugo Garcia.

12 MS. MALDONADO: Buenos tardes. My name is
13 Jennifer Maldonado. I am a healthy community fellows with
14 the funders' collaborative on youth organizing at
15 inner-city struggle, a non-profit based in East LA. We
16 organize with youth and parents in Lincoln Heights,
17 El Sereno, unincorporated East LA, Boyle Heights and also
18 East Los Angeles. This is a continuation of the letter.

19 "Because of the lack of clarity by El Sereno
20 Caltrans residents related to the DEIR, ASP and SRIA
21 documents the United Caltrans Tenants are asking for
22 Caltrans to add an additional 3 months to the original
23 deadline of August 24th, 2015 for public comments. This
24 would revise and extend the public comment period deadline
25 to November 24, 2015, with a stipulation that Caltrans

T1-7-1

1 issue a Spanish language CD no later than August 31st,
2 2015 to all Caltrans households and hold 2 additional DEIR
3 workshops in the El Sereno community, one in English and
4 one in Spanish within the newly established comment
5 period. We believe that this request is reasonable,
6 justified and necessary in order to allow monolingual
7 Spanish Speaking residents time to somehow assimilate
8 these complex documents. Bear in mind this is necessary
9 because Caltrans failed again to conduct effective
10 outreach to, and address the specific needs, of this
11 well-defined Latino residential population in El Sereno."

T1-7-1

12 "One statistic contained in the DEIR that is most
13 confusing and alarming, is that Caltrans calculated that
14 148 Caltrans households will be displaced and relocated
15 during the house sale process. UCT members do not
16 understand this! How is this massive displacement
17 (eviction) justified? Caltrans states that this estimate
18 is based on a 2015 DRIR, yet this 2015 DRIR has not been
19 provided to Caltrans tenants or available for review; not
20 in the body or appendix of the DEIR, nor in the Caltrans'
21 website. UCT is requesting that the 2015 DRIR be provided
22 to all Caltrans residents in English and in Spanish. As
23 we write this, we have, to date, contacted Caltrans Deputy
24 District Director Ron Kosinski's office two times and both
25 times have been misdirected to DRIR's for other projects

T1-7-2

T1-7-3

1 (I-710 South DEIR 710 and the I-710 North DEIR). We need
2 the 2015 DRIR related to the surplus property sales DEIR
3 and we need additional time to study it - yet another
4 document in addition to the 400-page DEIR."

T1-7-3

5 So since I have 50 seconds left I just want to put
6 in context how historic El Sereno is and historically
7 Los Angeles and also even projects such as guided by
8 Caltrans has ignored El Sereno. I do not see 148 families
9 in here. I really believe that when it comes to problems
10 like this, there needs to be a longer process. Thank you
11 so much for your time.

T1-7-4

12 MR. BRITT: Thank you. Yvonne Rodriguez followed by
13 and then Joe -- looks like Carino or Cano. Okay.
14 Joe Cano.

15 MS. RODRIGUEZ: Hi. I'm Yvonne Rodriguez and I'm a
16 Caltrans tenant. I'm continuing the letter.

17 "Regarding the projected 148 household displacements
18 we have the following observations:

19 "There will be a disproportionate impact on the
20 working-class community due to financial circumstances:
21 UCT believes that if Caltrans' calculation of 148
22 households is accurate it's likely that El Sereno
23 residences will bear a disproportionate number those
24 displaced due to the average financial circumstances of
25 El Sereno residences when compared to other residents from

T1-8-1

1 other affected cities on the I-710 corridor. When viewed
2 in this context UCT believes that this is but another
3 instance of blatant discrimination on the part of Caltrans
4 severely affecting Caltrans residents from the
5 predominately Latino community of El Sereno. Furthermore,
6 Caltrans needs to be more open and transparent with
7 residents and disclose who are these affected tenants and
8 how did Caltrans arrive at this calculation.

T1-8-1

T1-8-2

9 Number two: "Where will displaced El Sereno
10 Caltrans residents go to find comparable housing stock?
11 The DEIR reports the following under community impacts:
12 'Relocations: No impact: There are 148 households
13 anticipated to be displaced. To increase the potential
14 for occupants to obtain financing to purchase, and thereby
15 avoid and minimize the number of people displaced, the
16 California Department of Transportation (Caltrans) is
17 working with the California Housing Finance Agency to make
18 more financing products available to prospective buyers
19 than are currently readily available in the general
20 lending market. Occupants who do no purchase will be
21 provided advisory assistance to find and relocate to
22 comparable housing, and Caltrans will seek assistance from
23 agencies such as the United States Department of Housing
24 and Urban Development (HUD) to find affordable housing."
25 Thank you.

T1-8-3

1 MR. BRITT: Thank you. Hugo Garcia, followed by Joe
2 Cano and then Therese Cano.

3 MR. GARCIA: My name is Hugo Garcia. I'm with the
4 United Caltrans Tenants and president of the El Sereno
5 organizing committee. We've been around for about 25
6 years. We are part of the lawsuit, we're having a 20-year
7 anniversary that we filed our lawsuit against Caltrans for
8 environmental justice back then, 1995.

9 I'm going to follow with the comments that were read
10 just previously.

11 "Caltrans, in their own words, views uprooting 148
12 households as, 'No Impact.' Caltrans' recipe for
13 effective mitigation of the looming homeless crisis is
14 ludicrous. If Caltrans is going to displace roughly 1/3 of
15 their tenants they need to present a coherent and
16 well-defined relocation plan that articulates and details
17 specifically how Caltrans is going to address the housing
18 needs of the newly-created homeless population from
19 El Sereno. UCT asserts that all of the solutions outlined
20 by Caltrans are intangible, noncommittal and will not
21 avoid, minimize or avert homelessness.

22 "The displacement of 148 households will result in
23 classic gentrification in the community of El Sereno: No
24 one is more vulnerable to the effects of gentrification
25 than renters. When prices go up, tenants are pushed out,

T1-9-1

T1-9-2

1 whether through natural turnover, rent hikes, or
2 evictions. Large increases in rent and home prices, and
3 increases in evictions will result in a decline in the
4 proportion of racial minorities, and a reduction in house
5 household size, as low-income families are often replaced
6 by young singles and couples. When buildings are sold,
7 buyers often evict existing tenants to move in themselves,
8 combine several units, or bring in new tenants at a higher
9 rate. The social, economic, and physical impacts of
10 gentrification often result serious political conflict,
11 exacerbated by differences in race, class, culture and
12 community character. New ideas begin to emerge about what
13 is desirable and attractive, including standards for
14 architecture, landscaping, public behavior, noise, and
15 nuisance. Gentrification has been the cause of painful
16 conflict throughout the nation, often along racial and
17 economic lines. Neighborhood change is often viewed as a
18 miscarriage of social justice, in which wealthy, often
19 Anglo, newcomers are congratulated for 'improving' a
20 neighborhood who's poor, minority residents are displaced
21 by skyrocketing rent and economic change."

22 So we feel that with 148 houses projected by
23 Caltrans, you know, roughly one third of the population,
24 where's that going to fall? Most of it is going to fall
25 on El Sereno and then they're going to jack up the prices

T1-9-2

T1-9-3

1 or sell the homes to people that can't afford them;
2 therefore, you have a change in the community. We want to
3 keep our community intact and we think Caltrans has a
4 responsibility and obligation under NEPA and CEQA to
5 address that issue effectively and not say that it's no
6 impact, because it is.

7 MR. BRITT: Thank you. Joe Cano. Followed by
8 Therese Cano.

9 MR. CANO: Okay, I'll read this. Joe Cano,
10 El Sereno resident. I'll read this statement.

11 "This is a tremendous loss of affordable housing for
12 the State of the California and the City of Los Angeles:
13 It's well document that's throughout the City of
14 Los Angeles we are now, and have been, experiencing a
15 severe shortage of affordable housing. To contribute to
16 this affordable housing crisis affecting the most
17 vulnerable members in our community is unconscionable and
18 illustrates Caltrans' callous disregard for the health,
19 education and welfare of communities.

20 "UCT asserts that the National Environmental Policy
21 Act (NEPA), established in 1960, requires federal agencies
22 to analyze the environmental impact of actions that
23 'significantly affect the quality of the human
24 environment,' and the California Environmental Quality Act
25 (CEQA) requires agencies to 'identify the significant

T1-9-3

T1-10-1

T1-10-2

1 effects on the environment of a project, to identify
2 alternatives to the project, and to indicate the manner in
3 which those significant effects can be mitigated or
4 avoided. UCT is making it clear to Caltrans that their
5 failure to recognize and mitigate the significant effects
6 of this project, especially those related to the projected
7 148 household displacements is a clear violation of
8 NEPA/CEQA statutes and raises the possibility of legal
9 action on the part of El Sereno residents.

10 "To grant an extension for these important matters
11 is without precedent as Caltrans has in the past granted
12 up to two extensions in the same public comment period.
13 Please reference UCT's letter from Hugo Garcia and Roberto
14 Flores dated March 31, 2015 to Brent Green and
15 Jennifer Lowden. As we did then we again cite the
16 following:"

17 Administrative Procedure Act code 11340-11334.4.

18 "The language of many regulations is frequently
19 unclear and unnecessarily complex...The language is often
20 confusing to the person who must comply with the
21 regulations.

22 "The complexity and lack of clarity in many
23 regulations put small businesses [the public] which do not
24 have the resources to hire experts to assist them, at a
25 distinct disadvantage." Thank you.

1 MR. BRITT: Therese Cano followed by Linda Krausen
2 and Maria Miranda.

3 MS. HERNANDEZ: Hi there, Chester. We used to work
4 together and remember, it's Therese. My name is
5 Therese Hernandez and I will continue with what has been
6 read here.

7 Ironically, this 1946 issue where state
8 acknowledgment of the complexity to understand regulatory
9 language is directed to the English language population.
10 Fast-forward to today, especially as it relates to the
11 shift in demographic, the following needs to be taken into
12 consideration:

13 July 2014 Census Bureau reported about 14.99 million
14 Latinos live in California edging out the 14.92 million
15 whites.

16 The country's Latino population is now 55.4 million.
17 California and LA County have the largest Latino
18 populations of any state or county in the nation,
19 according to the new figures.

20 The demographic shift has been a long time coming.
21 According to state figures in 1970, the 2.4 million
22 Latinos accounted for 12 percent of the population, while
23 the 15.5 million whites in the state made up more than
24 three quarters of residents. By 1990, the Latino
25 population jumped to 7.7 million, or about 25 percent of

T1-11-1

1 the state's population.

2 California is a harbinger of the national rise of
3 Latinos. The nation's Latino population has grown
4 57 percent since 2000, 15 years ago, when Latinos numbered
5 35.3 million. Latinos accounted for 56 percent of the
6 nation's, the nation, the whole United States growth, from
7 2000 to 2010 according to the Pew Research Center.

8 Lastly, Marcelo Suarez-Orozco who is a professor and
9 dean of education at UCLA's Graduate School of Education
10 and Information Studies states, the continued influx and
11 growth of Latinos in the US is not being fuelled
12 exclusively by immigration but by second- and
13 third-generation immigrants becoming residents and
14 starting families. Just like El Sereno.

15 MR. BRITT: Thank you. Linda Krausen followed by
16 Maria Miranda and Nora Verdesoto.

17 MS. KRAUSEN: My name is Linda Krausen. I'm not
18 Latino, I do work with the Latino community, I'm a
19 certified Spanish interpreter.

20 And I'd just like to say before I read the portion
21 that's been given to me that the courts of the State of
22 California are under mandate to always have a certified
23 interpreter at the elbow of every defendant. Because
24 court procedures can affect the vital living conditions,
25 the vital interest, their life and money of the defendants

1 in the State of California. So I think that this
2 situation also effects the vital interest and the life
3 situation of many people who don't speak English. And
4 therefore, I would say that it would be imperative to use
5 more interpreted material and more interpreters and more
6 translations and more outreach. But let me read what I
7 was given.

T1-12-1

8 "So what is the point of all this data? The point
9 is that Caltrans needed to deal with and address all
10 outreach and linguistic needs of the principally a Latino
11 community of El Sereno in a manner is that fair and
12 appropriate.

T1-12-2

13 "UCT as well as the El Sereno Organizing Community
14 (ESOC) have repeatedly complained to Caltrans and local
15 elected officials about the continued substandard outreach
16 practices by Caltrans and their consultants. Yet it
17 continues. In fact it was addressed in a letter dated
18 March 1, 2013 from our local elected representatives, sent
19 to Caltrans officials Malcolm Dougherty, Brian Kelly and
20 Michael Miles. This letter noted the following:

T1-12-3

21 "Beyond citing recommendations made by the BSA,
22 Caltrans has failed to:

23 "Conduct outreach meetings in the affected
24 communities to explain the change in policy or the
25 qualification criteria for the affordable rent program;"

T1-12-4

1 See, that's pretty vital. I mean, if you can't
2 afford to buy a house or rent a house, you need to know
3 what's affordable to you and that should be explained.
4 You might have a benefit in there that you don't know
5 about.

T1-12-4

6 2. "Provide information in any language other than
7 in English, which represents a challenge for those tenants
8 whose primary language is not English" and just to note,
9 as we are in a Korean Church, there's more than just
10 Latino and Spanish and English spoken in this community.

T1-12-5

11 3. Make reasonable accommodations for all tenants
12 who have -- I mean, hire a certified interpreter.

13 "Make reasonable accommodations for all tenants who
14 have limited English skills, including having all notices
15 and information disseminated to tenants available in their
16 primary language and a person with bi-lingual skills
17 available at all public meetings with tenants as needed."

T1-12-6

18 "The following state legislators signed this letter:
19 Senator Ed Hernandez, Assemblymember Jimmy Gomez, Senator
20 Carol Liu and Assemblymember Chris Holden."

21 And Chris Holden, of course, is very interested in
22 affordable housing. And I just would like to make a
23 comment about the community of El Sereno which I did live
24 in for a time and this whole area. The people that are
25 affected by this these regulations, they're not just

T1-12-7

1 sticks or figures or digits or numbers. These are people
2 that have their roots -- I mean, if they were trees, you
3 would see a forest of people with lots of leafs in here.
4 These are people who have given character to this
5 neighborhood, who are in this neighborhood and deserve to
6 live in peace their last years in this neighborhood.

T1-12-7

7 And I heard a businessman recently on a documentary
8 state when he was having difficult in a particular city,
9 town, establishing a business and they were saying, well,
10 you know, you have to do it this and that way. And he was
11 saying that's not how I envisioned this. And he said they
12 say business is business, you know, it's cruel, it's hard,
13 just push them out, bring them in and start the new thing
14 and don't really have an emotion about it. And he said
15 that is not true. This is what the CEO said, he said
16 business is not just business. Business is an expression
17 of our values. So I would urge Caltrans to, please, have
18 the values of respect and sensitivity to the people who
19 are long time residents and under their care for many
20 years. Thank you.

T1-12-8

21 MR. BRITT: Thank you. Maria Miranda.

22 MS. MIRANDA: Hi, I'm Maria. I'm a tenant, I've
23 been here for 23 years. This is a continuation also.

24 "To this day Caltrans continues to not recognize or
25 act on the linguistic needs of the El Sereno community.

T1-13-1

1 That needs to change.

2 "In conclusion, UCT requests the following:

3 "That Caltrans add an additional 3 months to the
4 original public comment deadline of August 24, 2015. This
5 would extend the original public comment period of
6 November 24th, 2015.

7 "That Caltrans issue as Spanish language DEIR CD to
8 all Caltrans households.

9 "That Caltrans issue a copy of their 2015 DRIR to
10 all Caltrans households in English and Spanish.

11 "That Caltrans holds two additional DEIR workshops
12 in the El Sereno community, one in English and one in
13 Spanish.

14 "We would appreciate a timely response to our
15 request.

16 Best regards, Hugo Garcia, UCT/El Sereno,
17 Robert Flores UCT South Pasadena. The phone number is
18 (213)304-5424, robertof2@socal.rr.com.

19 I'm sorry, I forgot to read Hugo. It's Hugo Garcia
20 UCT/ESOC-El Sereno, (323)718-1223. Hgarcia4432@gmail.com.

21 CC: Senator Kevin de Leon, Assemblymember
22 Jimmy Gomez, LA City Counsel Member Jose Huizar, LA
23 Counsel Supervisor Hilda Solis, Senator Ed Hernandez,
24 Senator Carol Liu, Assemblymember Chris Holden. Thank
25 you.

Page 45

T1-13-1

T1-13-2

T1-13-3

1 MR. BRITT: Thank you. Nora followed by
2 Christopher Sutton. And Christopher is the last speaker
3 card that I have. So if anyone else would like to speak,
4 Raul will collect it.

5 MS. VERDESOTO: Hello, everybody. And it's
6 Nora Verdesoto. Sorry about the writing. I couldn't
7 write very well so that's why the rest of it is not filled
8 out.

9 Anyways, I didn't expect to get up and speak
10 everybody, so I apologize for my appearance and my
11 clothing. But some of the things I'm just noticing
12 because I was just sitting back there. And my roots go
13 back to the Native American History, I'm Native American
14 on my father's side. I'm deeply rooted to my culture,
15 very much so. A lot of our history books are incorrect.
16 We know that the native people have been taken out of
17 their lands for many years. It's not just what it is,
18 it's not what the history books say. It's really, they go
19 in and they take what they want. And this is a repeat.
20 And it hurts to see that.

21 To see my parents -- my father has a house here in
22 El Sereno, I was born in El Sereno. My roots go deep, my
23 father's roots go deep. We've been here for many, many
24 years. So see what's happening here again -- excuse me --
25 is just really hard for me to see it. I bleed the same

T1-14-1

1 color you bleed, our blood is the same; when you cut us,
2 we bleed red, same thing. So I'm just noticing just a lot
3 of different things as I sit back in the corner. I'm
4 noticing that, you know, you're busy and I know this is no
5 reflection on you, please. It's a reflection on what I
6 feel as far as Caltrans, what we've been doing. You're
7 busy doing things, Caltrans wants you to come up here and
8 speak our minds. And we speak our minds, but are they
9 listening? Are they listening to us? Are they really
10 hearing us?

T1-14-1

11 I was reading over some of the documentations, some
12 of the ones I could understand, some of the quote/unquote
13 jargons of what I could understand. And it feels like
14 they're tossing us a bone. They're going to do what they
15 want to do. But they're tossing us a bone. They're
16 telling us, here, you have an opportunity to make all
17 these comments. But are you listening? Are you really
18 listening to us? Do you really care? And that's the way
19 I feel. So it's emotional for me because I just feel like
20 it's a repeat of history over again. So that's how I
21 feel. And it's just a comment and my opinion. Thank you.

T1-14-2

22 MR. BRITT: Thank you. Christopher Sutton followed
23 by Victoria Sandoval.

24 MR. SUTTON: My name is Christopher Sutton. I'm an
25 attorney for the Caltrans tenants in the 710 corridor

1 which is a Caltrans tenant group at the north end of the
2 corridor. I have a lot of comments and I may have to come
3 back and speak again.

4 I want to turn in a copy of the Caltrans draft
5 relocation impact report which was apparent excluded from
6 this EIR because it was released after the draft EIR was
7 released even though metadata in this document showed that
8 it was drafted sometime in April 2015. So Caltrans,
9 typical of their continually dishonest and fraudulent
10 conduct held the DRIR until after the DEIR was released so T1-15-1
11 they would not have to evaluate the 148 families being
12 displaced. So I want to hand a copy to the Caltrans
13 people. So I see that Ms. Allison whatever her name was
14 has moved away. So that shows that I have given them a T1-15-2
15 copy of the draft relocation impact report and I want its
16 analysis and a response to it included in the draft EIR.

17 Earlier today, I sent in an EIR comment on the
18 website and I tried to print out a copy of my comments but
19 the Caltrans website, as was earlier stated, you can't
20 print out a copy of your own comments because it cuts it T1-15-3
21 off when you try to print it off. This is what I tried to
22 print out from my comments and it shows where my comments
23 were cutoff by the Caltrans software. So the Caltrans
24 software is defective in allowing people to print out
25 their own comments and I would like to turn this in as

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

well.

The reason why -- I got a minute and 20 seconds but I should be back -- the reason why Caltrans will displace 148 people or 148 families and maybe more is because Caltrans uses income data from the entire county to set the qualifications to participate in the affordable sales program. By the way, the initials of that is ASP which means "a poisonous snake," ASP. It's the snake that Cleopatra used to kill herself.

So the affordable sales program uses income data from the whole county, which then drives down the qualification criteria, yet they use data from the adjoining neighborhoods, which are very wealthy, to drive up the value of the homes and the rent on the properties. So Caltrans uses the income levels to keep people out of the affordable sales program. And then they use sales data and market data to keep people out of the purchasing and renting of the properties.

So Caltrans is not consistently using the geographic areas for sales data and for income data. They maximize the amount of displacement that will occur by selectively choosing data which results in people being disqualified. So they're allowed under California HCD regulations and HUD regulations to redefine area median income. And if they would use the local median income in the areas where

T1-15-3
T1-15-4
T1-15-5
T1-15-6
T1-15-7
T1-15-8

1 they are using the real estate to set the prices, the
2 median income would come up, the 150 percent median range
3 in 54237 in the Roberti Act would come up and a larger
4 number of people would qualify to buy and rent their
5 houses based upon their actual income, not the income of
6 people who live in Watts or in Landcaster or other places.

T1-15-8

7 So Caltrans needs to consistently use the income and
8 sales data from the same geographic locations. And this
9 is the kind of thing that was never evaluated in this
10 draft environmental impact report about why people are
11 being -- going to be displaced because Caltrans always
12 uses the data that results in the maximum displacement of
13 people.

T1-15-9

14 Caltrans, for the last 50 years, has always placed
15 freeways and Caltrans projects in areas where there are
16 low income people and minority people. That's what
17 they're doing, have always done.

T1-15-10

18 Caltrans, when they hire people to do maintenance on
19 these properties, regular contractors won't work for
20 Caltrans because it takes six months to a year to get
21 paid. Caltrans hires shotty contractors who then, we
22 believe, are simply paying money back under the table to
23 the Caltrans employees. And that's why maintenance is
24 done at empty properties, roofs are replaced that are not
25 leaking, driveways are poured where no one is living, and

T1-15-11

T1-15-12

1 Caltrans has a continuous practice of, apparently,
2 spending money on unnecessary repairs while not doing
3 repairs in the houses where people live.

4 And why was Caltrans real property manager
5 Linda Wilford asked to leave Caltrans? It's a mystery.
6 She never would have quit on her own. We believe she left
7 under the threat of criminal prosecution.

8 MR. BRITT: If you can keep your comments to the
9 three minutes and focus on the environmental document.

10 MR. SUTTON: The environmental document in this
11 instance is a result of Caltrans corrupt practices in
12 trying to displace people, trying to pay money to
13 contractors unrelated to the community. Why do none of
14 the Caltrans employees promote translation of these
15 materials into Spanish or into Korean or other native
16 languages of the people who are affected, but are
17 circulating a document that even a lawyer has a hard time
18 understanding. So I would like to have it translated to
19 Spanish.

20 But beyond that, Caltrans has segmented this DEIR
21 from the SR-710 North DEIR even though these two DEIRs are
22 intimately related. Under CEQA, you can't segment
23 projects between two EIRs and you need -- this DEIR is
24 saying, we will not know what we're going to sell or who
25 we're going to displace until the other DEIR on the

T1-15-12

T1-15-13

T1-15-14

T1-15-15

1 freeway is finished, which just had comments close
2 yesterday, and the final EIR on that won't be out until
3 sometime next year.

4 So what Caltrans has done by segmenting the
5 relocation report, segmenting the freeway tunnel EIR from
6 the surplus housing EIR, they have failed to analyze the
7 interrelationship between those documents which is a
8 violation of CEQA. And I have additional comments and I
9 will come back when people have said their say. Thank
10 you.

11 MR. BRITT: Thank you very much. Victoria Sandoval,
12 Maria Crespo and Elisa.

13 MS. SANDOVAL: My name is Victoria Sandoval and I do
14 not rent from Caltrans. I live on Maycrest Avenue and I
15 am here on behalf of my neighborhood. According to your
16 DEIR report 19 dwellings on my street alone will be
17 affected. The street is located in El Sereno and
18 according to your DEIR table 4-4, in El Sereno alone 85.4
19 percent are of Hispanic and Latino origin and 43.9 percent
20 have been here since 1999 or earlier.

21 My mother and intellectually-challenged sister are
22 in this group. According to the 2014, DRIR 148 families
23 are targeted to be displaced. It's actually interesting
24 because you brought on the screen four of the boards that
25 you have back there, but you didn't put on the screen the

T1-15-15

T1-16-1

T1-16-2

1 last three that actually address the 148. I thought that
2 was very interesting.

3 Since the 2015 DRIR was not attached to the CD
4 document containing 400-page document, perhaps more
5 families will be displaced. Our community needs at least
6 a 90-day extension to address this lengthy 400-page
7 analysis. I am seeing neighbors having to leave the
8 residences or get evicted because of the 10 percent pay
9 hikes. These rent hikes have to stop. A moratorium needs
10 to be put into place until the house sales are completed
11 or could it be these rent hikes are a way for Caltrans to
12 systematically remove the residents from their current
13 homes in order to prepare them for sale.

14 If you raise the rent, you lose the community;
15 that's what Roberti said. The US government can't even
16 pay it's bills, but unlike the government we can't print
17 money. My mother and my sister have lived this their
18 residence for 45 years and she knows a lot of neighbors
19 who have come and gone but who are also still here. Her
20 neighbors help her when she needs help. She's a definite
21 part of the community she has been and still is an active
22 member of her church. She is well-acquainted with her
23 pastors and church members. Even my sister has been
24 attending the same school for the mentally challenged for
25 almost 30 years.

T1-16-3

T1-16-4

T1-16-5

1 If my mother and sister are part of the 148
2 identified to be relocated in the 2014 DRIR then Caltrans
3 is truly discriminating against the elderly and the
4 disabled; to not offer them the opportunity to purchase
5 their homes would be a travesty.

T1-16-6

6 MR. BRITT: Thank you. Maria, followed by Elisa.

7 MS. CRESPO: Thank you. My name is Maria Crespo. I
8 live in El Sereno and I have been tenant at this residence
9 for 45 years, almost half of my life. I am a senior
10 citizen of low income and I have taken care of my daughter
11 all of her life; she mentally disabled. She has been
12 living at the same residence since she was five years old.

13 If I am one of the 148 who will be relocated then I
14 feel that Caltrans is discriminating against the elderly
15 and my disabled child. I have always been a tenant in
16 good standing and have taken care of my house as much as I
17 can. I should be given an opportunity to purchase this
18 home that I have lived in almost all my life. And my
19 daughter should be given the opportunity to live in the
20 only home she knows.

T1-17-1

21 Relocating my daughter and I would be a traumatic
22 and emotional move. I have known by neighbors, their
23 children and grandchildren all these years. My daughter
24 and I have strong religious and spiritual ties to my
25 pastors, my church and its members. To relocate would

T1-17-2

1 affect my spiritual wellbeing.



T1-17-2

2 I also speak up for many friends I have who rent
3 from Caltrans and who also care for their disabled family
4 members. Thank you.

5 MR. BRITT: Thank you. Elisa fold by Linda Krausen.

6 MS. ALMEIDA: For those of you who didn't hear my
7 mother's comment, she said, "Why are you going up again?
8 They don't do anything anyway."

9 Okay. Elisa Almeida resident and tenant of Caltrans
10 in El Sereno. In regards to dislocating, this is an
11 opinion more than a comment. I feel like this is another
12 Chavez Ravine. Someone was speaking about her roots, her
13 Indian roots, but if anybody really goes into youtube and
14 really looks at Chavez Ravine, this is what is happening
15 again. It may be a little bit smaller, it may be bigger
16 than what we actually think, but it is another Chavez
17 Ravine.

18 Now, I did say something about -- well, about the
19 housing -- this is about the housing. Why and who decides
20 who the can buy the house? As far as that goes,
21 Chris Sutton was talking about that and back in the day
22 when I was in real estate, nothing much has changed as far
23 as programs, you can get programs, you can get loan
24 brokers, you get cosigners, there's all kinds of things
25 you can do even if you're low income. So I just want

T1-18-1

T1-18-2



1 people to know that. You got to go out and do your own
2 research on that. You can buy a house even if you're
3 borderline poverty like I am. Your FICO is good, you got
4 the house.

T1-18-2

5 And Roberti law, that seems to be ignored.
6 Caltrans, they say they're doing this, this, that
7 according to Roberti, but are they really? I don't think
8 so. I don't think so. And tomorrow -- I mean, and the
9 next meeting Roberti will be speaking, I am so happy for
10 that.

T1-18-3

11 Okay. Now, comment. To maintenance, I ask the new
12 right of way -- I have asked the new right of way -- oh,
13 because they called and said my yearly inspection,
14 everybody knows what that's about, right? They inspect
15 and it stays the same for five years. So that five year
16 shit, that's got to go. Anyway, maintenance, I ask the
17 new right of way, Edward Francis, what qualifies your
18 agents as inspectors? He had a very long pause and then
19 came out saying oh, we give them training. I said, what
20 kind of training? Oh, we train them. Then I go, okay.
21 You come ahead and inspect. Anyway, it's going to stay
22 the same. Well, lo and behold, he came with a real
23 inspector. But I'll say half real inspector. Because a
24 real inspector will go up into the attic, will go under
25 the house, will go all over your house when you're buying

T1-18-4

T1-18-5

1 a home.

T1-18-5

2 Okay. And the reason why I know all this, by trade,
3 I have my certificate in interior decorating. So there is
4 a lot I know about what's wrong with the house. And one
5 of them is that a lot of these houses are not up to code.
6 How many of you have your water heater inside the house?
7 That's bad. That's Caltrans for you, they don't keep up
8 to code.

T1-18-6

9 So when your agent comes to inspect, look out for
10 those things. You're thermostat, your water heater, those
11 things have to be inspected too. All he does is take
12 pictures of what you added to the house. You improved the
13 house for them.

T1-18-7

14 Okay. Now, calm down, Elisa. My mom's family,
15 somebody talked about roots again and generations, my
16 mom's family, we've gone through three generations. Okay?
17 My mom, then me, I left, came back because my dad went to
18 heaven and mom didn't want to be alone, I can't do it
19 alone. Okay. Then my daughters, they were homeless, come
20 to our house. Okay. Got on her feet, moved out, six
21 months later and we saw the grandkids. How many
22 generations, all of us. We have roots. We have roots, we
23 seen generations. I've seen my neighbors' children and
24 now their children's children. And I'm like, he was a
25 baby, what happened to him? He grew up. This is what

T1-18-8

1 we're seeing and this is what they're uprooting.
2 Generations, which makes a community. And like I said,
3 going back to Chavez Ravine, that's what I see.

T1-18-8

4 MR. BRITT: Thank you. Linda Krausen followed by
5 Christopher Sutton.

6 MS. KRAUSEN: I don't mean to be hogging the
7 microphone, but there were some points that I want to
8 make. Can I raise this up a little? Thank you.

9 There was some points I wanted to make on my own as
10 a resident of South Pasadena for the last 20 -- well, it's
11 around 23 years. My daughter was raised there and went to
12 school in South Pasadena, et cetera. So I too have roots.

13 But I wanted to say that in terms of the
14 environment, actual environment, my house had to be
15 inspected with men in Hazmat suits because a whole layer
16 of the flooring, under a couple of layers and then there's
17 a whole layer of asbestos. So there's asbestos in the
18 house that they had to cover up in a certain way so it
19 wouldn't seep up. The second thing I'd like to say, and
20 this probably applies to other homes, is that the area
21 that my house is located on, on the street of Grevelia at
22 1100 block, faces the freeway. Of course, there's
23 mitigate foliage but I'm saying that area used to be a
24 dump for the Santa Fe Railroad. Most of the property that
25 I live on which is a rather large area, but most of it is

T1-19-1

T1-19-2

1 unusable because it is covered with asphalt. Because that
2 used to be the dump and then that was covered over to make
3 a parking area for the vehicles, for the Santa Fe
4 Railroad. So these are environmental factors that I think
5 would be need to taken into consideration in valuing the
6 property.

7 The other thing I'd like to state is, we all know
8 that money puts pressure. After the evaluation of
9 Caltrans ownership of the property and the way that it
10 took care of the properties and so forth, I'm trying --
11 I'm reaching for a word -- its stewardness of the
12 properties under its control, it was found that they
13 made -- they were very poor landlords and they were urged
14 by the other state agency to sell properties.

15 Now, the other day I got a postcard from a property
16 just over the freeway from me that I have walked past many
17 times with my dogs. I saw this property, couldn't believe
18 it and then I got a postcard about it. It's an enormous,
19 grotesque, monstrous expansion of an idea of what a
20 craftsman house might look like if it was blown up twice
21 or -- I mean, like 10 times its size. Then I get a
22 postcard and it says come to Palais de Tigres [sic].
23 That's South Pasadena now has a palace, palace of the
24 tigers. It's this huge property, they took the whole
25 property and built sort of an imitation craftsman but

1 huge, everything is huge. The bricks are bigger, the
2 columns are huge the portico enormous. And it's a huge
3 property that extends all the way back and then it
4 connects with the corridor, I suppose it was permitted
5 probably by the zoning R2, all the way back to another
6 house. And it's called Palais de Tigres and it's valued
7 at \$3,000,979. That's in my neighborhood.

8 Now, another house on my street, two houses away
9 from the freeway, two, three, blocks down, and I happen to
10 know the owner is a friend of mine, he bought the
11 property, it's a little craftsman house, like they ought
12 to be, a very small little lot, normal for South Pasadena
13 and his property cost him \$990,000. In other words, just
14 about a million with a few work that he had done, for
15 example, stone fences and so forth.

16 So this is what's going down the street on Fremont
17 which is so heavily trafficked, the pollution is terrible.
18 It's, again, a million dollars, a house for sale, around
19 the corner, one million two. And so this is the pressure
20 that's on Caltrans.

21 What I'm trying to say is, I can see a connection
22 between this kind of real estate pressure and the wanting
23 to evacuate or wanting to take homes away from 148 of our
24 residents.

25 The so-called non-profit, Esperanza, kicked out, on

T1-19-4

1 my street, three families. One of them they told, you're
2 too poor to live in South Pasadena, you cannot afford to
3 live in South Pasadena. This is an affordable housing
4 entity. That bought these homes for pennies because they
5 were supposed to be affordable housing, threw them all
6 out, is doing major repairs and who knows what the rent
7 is, but different kind of people are moving in.

8 So I'm just trying to say that I think that we
9 should -- it is not conspiratorial, it is not evil or
10 slanted to view the dislocation of 148 people of the
11 tenants of South Pasadena in this corridor that's under
12 Caltrans control, it is not that conspiratorial to view
13 that as a, kind of, purposeful act on the part of Caltrans
14 to make more money on these properties. Thank you.

15 MR. BRITT: Thank you. Christopher Sutton.

16 MR. SUTTON: The purpose and needs section of the
17 DEIR mistakenly says that the purpose of the Roberti law
18 is to provide affordable housing without saying that the
19 purpose of the Roberti law, as provided in section 54235
20 of the government code, is to preserve these neighborhoods
21 and to provide the people who live in the houses today the
22 right to stay in those houses.

23 So that, by Caltrans failing to evaluate the duty of
24 Caltrans to preserve the neighborhoods under the Roberti
25 law, they have mistakenly characterized the Roberti law as

T1-19-5

T1-20-1

T1-20-2

1 simply a law to provide affordable housing to anybody even
2 if it means displacing the people who live there today.
3 When, in fact, the purpose of the Roberti law is it to
4 preserve the people in place at the housing. And that's
5 what Senator Roberti will tell you what he speaks on
6 Monday.

T1-20-2

T1-20-3

7 In fact, in the Roberti law, this is in the third
8 paragraph of 54235, it says, the legislature further finds
9 and declares that the displacement of large numbers of
10 persons as a result of sale of surplus residential
11 property owned by agencies of the state is a significant
12 environmental effect within the meaning of article 19 of
13 the California constitution. And what that means is that
14 even though these properties were acquired with gas tax
15 money which is what article 19 governs, article 19 of the
16 constitution says that money acquired by the gas tax is
17 also to be used to mitigate the environmental effects of
18 Caltrans activities.

T1-20-4

19 So that, if Caltrans destroys a park, it's supposed
20 to replace a park. If Caltrans destroys a housing, it's
21 supposed to replace housing. On the 105 corridor, 20
22 years ago, 30 years ago, Caltrans went out and
23 affirmatively constructed hundreds and hundreds of units
24 to replace the housing that was displaced by building a
25 century freeway. So that, the DEIR fails to include an

T1-20-5

1 alternative where Caltrans will build replacement housing
2 for the people.

T1-20-5

3 Now, going back in a little history back in 1989
4 Caltrans approached the legislature in another law, the
5 uniform and relocation act, and got an amendment passed at
6 Caltrans' insistence that said any person who lives in a
7 property that has been owned by a public agency for more
8 than two years shall not be entitled to relocation
9 assistance, payments or benefits of any kind. So that the
10 no impact analysis in the draft relocation impact report
11 and in the draft environmental impact report is simply
12 contrary to state law. Because the 148 families who will
13 be displaced are barred from receiving relocation or
14 assistance or replacement housing by a law that Caltrans
15 had put in place. And Caltrans has not proposed any kind
16 of relocation plan under federal relocation law that would
17 specifically entitle these people to a new location.

T1-20-6

T1-20-7

18 So that, the impact, the environmental impact of
19 displacing 148 families by Caltrans' manipulation of the
20 data, the income data and the sales data, so that many
21 people will not qualify to buy their own place where they
22 live is, in fact, not -- is an unavoidable environmental
23 impact that must be mitigated in some manner.

T1-20-8

24 In CEQA, section 21004 allows Caltrans and any
25 public agency when they have an environmental impact that

T1-20-9

1 must be mitigated to use all the discretionary power they
2 have to mitigate that impact. 54237 of the Roberti bill
3 allows Caltrans to invoke HUD and HCD regulations which
4 allows Caltrans to redefine area median income and
5 Caltrans could redefine area median income to include the
6 specific three zip codes where people reside in the
7 corridor; so that the area median income for income and
8 for housing costs would be the same geographic area. This
9 would mitigate the environmental impact and displacement
10 by allowing a much larger, maybe everyone, qualify to buy
11 the house in which they reside.

T1-20-9

12 Now, in addition, aside from the Roberti law, other
13 state laws allow people to buy the property in which they
14 live, have a business, operate a nonprofit. And that's in
15 streets and highway code section 100.2 through 118.6.
16 118.6 of the streets and highways code requires Caltrans
17 to develop regulations that explain how they decide which
18 properties they're going to sell and which properties
19 they're not going to sell. A year ago, Caltrans released
20 a list of 42 properties and a few vacant properties that
21 they decided to sell without any explanation. We have
22 been demanding for over a year that they explain and adopt
23 regulations about how they choose which properties to sell
24 and which properties not to sell. We have no information.
25 The draft regulations are silent on how the decisions are

T1-20-10

T1-20-11

1 made on which properties they're going to sell and which
2 ones they're not going to sell.

3 We need to have regulations that address the
4 environmental impacts of the displacement and the
5 selection of these various properties. Without that
6 regulation, the entire process violates the administrative
7 procedures act.

8 In 2007 Caltrans was found by the superior court to
9 be violating the administrative procedures act in a case
10 filed by the city of South Pasadena. That put on hold a
11 sale of a number of properties to these so-called
12 nonprofit entities.

13 Earlier, Linda Krausen talked about the sale of 11
14 properties to this Esperanza housing entity back in 2001.
15 Caltrans bundled all 11 properties together so that the
16 tenants could not bid on any of the properties. This
17 nonprofit entity which came into existence overnight,
18 founded by former executives in the savings and loan
19 industry bought the 11 Caltrans properties for \$660,000,
20 roughly 20 cents on the dollar. They have been using
21 those properties to jack of the up the rents, move people
22 out. Linda Krausen just talked about the three families
23 on Grevelia which were just evicted by Esperanza housing
24 and Caltrans has taken no action. Caltrans fails to take
25 action when these nonprofit housing entities violate the

T1-20-11

T1-20-12

T1-20-13

1 Roberti bill, violate the covenants under which they
2 bought the properties and raise the rents exorbitantly and
3 evict tenants.

T1-20-13

4 So that, Caltrans' inability to deal with
5 displacement, its inability to deal with environmental
6 impact needs to be evaluated in this draft EIR; otherwise,
7 we don't even know whether will follow through on any of
8 the promises it's made. So this draft EIR needs to be
9 linked to the SR-710 North Freeway EIR and until the two
10 projects are linked together and evaluated jointly, both
11 EIRs are in violation of CEQA.

T1-20-14

12 Now, also as a matter of caution, I want to turn in
13 a copy of the full comments I submitted this afternoon to
14 the website; that it doesn't have the cutoff part that
15 Caltrans has in theirs. So this is the full comments I
16 submitted this afternoon.

T1-20-15

17 If Caltrans truly wanted to minimize the
18 environmental impacts of this program, Caltrans would
19 analyze the sales program that the Caltrans tenants
20 delivered in 2006 to then Caltrans director Will Kempton,
21 we then delivered it again in 2008 to then Caltrans
22 director Randy Iwasaki. I was there, so was the
23 Assemblyman Portintino [sic], it was in the assemblyman's
24 office. We delivered these to the Caltrans director, the
25 whole head of Caltrans; and both Caltrans directors said

T1-20-16

1 we are going to submit these to Governor Schwarzenegger
2 and seek a governor's option action request. We had a
3 two-page outline which would expedite the sales of these
4 properties so it wouldn't take five years. We identified
5 the Caltrans person who had done the sales between 1996
6 and 2002 and she was very competent at getting these sales
7 done and out the door. She was then replated in 2002 and
8 the sales ground to a halt and the last sale occurred in
9 2006 of the first crop.

T1-20-16

10 Of those crop of sales, in 1995 the then head of
11 Caltrans James van Loben Sels who then worked for Governor
12 Wilson sent a memo to Caltrans in Los Angeles saying, I
13 want to sell 100 of these properties as soon as possible.
14 The Caltrans personnel in Los Angeles, insubordinate as
15 always, sent van Loben Sels a list of 52 properties.
16 Eventually, with the help of this one person at Caltrans,
17 over ten years, they sold about 32 properties including 11
18 to this bogus nonprofit Esperanza.

T1-20-17

19 In addition -- and they had submitted a list of 52
20 to the federal court to be approved as part of the 1979
21 injunction review. But Caltrans then went ahead and sold
22 another 16 properties in the corridor that were never
23 considered as surplus, they just did it out of blue. And
24 without any regulations or anything.

25 So Caltrans has the ability, if they want, to speed

1 up the sales, complete the sales, do them faster. And
2 that the Caltrans staff in Los Angeles has over the last
3 20 years, since 1995, dragged their feet when the
4 governor's appointee that's head of Caltrans, starting
5 with James van Loben Sels and then under Governor Davis,
6 under Governor Schwarzenegger and now under Governor
7 Brown. The Caltrans staff in Los Angeles, quite frankly,
8 believes they are unable to accomplish the sales, they are
9 afraid of making a mistake and so they don't want to have
10 the sales go forward. I'm not going to list the Caltrans
11 employee's name who handled sales very quickly between
12 1996 --

13 MR. BRITT: Excuse me. Could you wrap up your
14 comment, there are more people that want to speak.

15 MR. SUTTON: Fine. Caltrans has the ability and the
16 staff to complete these sales in a very rapid period,
17 maybe one or two years. And proposing in the DEIR that it
18 takes five years is draining people's income while
19 Caltrans raises the rent in displaced peoples and has
20 further impacts. It is very important that there be an
21 alternative in this DEIR that says that the sales program
22 will be accomplished within two years. Thank you.

23 MR. BRITT: Thank you for your comment. Don Jones
24 would like to speak again. And then I would just like to
25 do a time check. It is after 8 o'clock, we've reserved

T1-20-17

T1-20-18

1 this facility from six to eight. If you would like to go
2 back and look at the boards, they're still up with people
3 standing by them and ask any questions. So this will be
4 our last comment for the night.

5 MR. JONES: Thank you. Thank you, very much. There
6 was a person who did a lot of transportation planning
7 about 40 years ago, his name was Daniel Patrick Moynihan.
8 He coined a phrase called "benign neglect." That's where
9 agencies like Caltrans would allow certain consequences to
10 unfold, negatively impacting tenants and communities and
11 it was seen as benign, almost passive. They really didn't
12 mean to do it, it's just a consequence of the process that
13 148 families get evicted or lose their homes. But that's
14 not the fact.

15 I'm thankful to Christopher Sutton for reminding me
16 about Linda Wilford and the memo she put out in 2006
17 targeting pot-stirrers, 11 families who had advocated
18 against the rent increases who managed to put placards in
19 front of their homes, were targeted by an internal memo
20 Linda Wilford addressed to then -- to the 710 director,
21 Doug Failing; that has been introduced into evidence in
22 several lawsuits.

23 So we need to understand that, of the 11 families
24 that were targeted as pot-stirrers, none of them are still
25 there. Manny Morales, his two neighbors, Big John, me, I

T1-21-1

1 can name others. But I don't want to name them because
2 they haven't said I could. But the fact is that we are
3 targeted in this process. I have no doubt that several of
4 us who are standing here today will be targeted by those
5 folks sitting at that side over there. They've already
6 indicated their animus towards us by their neglect.

7 It's not benign neglect, it's intentional, you can
8 see that by the sequences. We are real people. We are
9 not concepts. We struggle for the real lives of real
10 people of this community. We are not pass through, we are
11 not "paracaídas," parachutes that come in here and
12 dominate our community and then take their consulting
13 money, jump in their Porsches and drive out to the
14 Westside to have a couple bb slings [sic]. That's all I
15 have to say.

16 MR. BRITT: Thank you for your comment. So I want
17 to thank everyone for taking the time out tonight. We
18 did, as I mention, have our court reporter here recording
19 all of the comments. And we will be having another
20 meeting on August 10th, which you should have gotten
21 information about when you came in as well. So thank you
22 so much. And if you would like to ask any questions,
23 we'll be by the boards.

24 (STATE ROUTE 710 SURPLUS PROPERTY SALES PUBLIC.
25 HEARING concluded at 8:04 p.m.)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

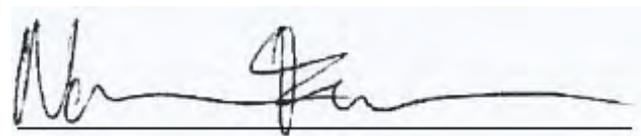
That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were administered an oath; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [] was [] was not requested.

I further certify I am neither financially interested in the action nor a relative or employee of any attorney or any party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: August 20, 2015



NATCHEZ FOWLER

CSR No. 13913

<p>1</p> <p>1 1:24 11:23,23 12:14 42:18 1/3of 36:14 10 9:21 26:14 53:8 59:21 100 28:23 67:13 100.2 64:15 105 62:21 10th 4:15 13:15 31:17 70:20 11 65:13,15,19 67:17 69:17,23 1100 58:22 11340-11334.4. 39:17 118.6 64:16 118.6. 64:15 12 40:22 13913 1:22 2:8 71:25 14 5:14 22:17 14.92 40:14 14.99 40:13 148 20:15 27:7 33:14 34:8,17,21 35:12 36:11,22 37:22 39:7 48:11 49:4,4 52:22 53:1 54:1,13 60:23 61:10 63:12,19 69:13 15 41:4 15.5 40:23 150 50:2 16 28:24 67:22 18 25:4 19 52:16 62:12,15 62:15 1946 40:7 1960 38:21 1960s 19:8 1970 40:21 1971 23:17</p>	<p>1979 19:20 67:20 1980 10:19 1981 19:5 1989 63:3 199 27:22 1990 40:24 1993 19:5 1995 36:8 67:10 68:3 1996 67:5 68:12 1999 52:20 1st 29:19</p> <p>2</p> <p>2 10:22 11:21,23 12:9,16 14:13,22 15:8 30:16 33:2 43:6 2.4 40:21 20 21:17 22:25 25:5 36:6 49:2 58:10 62:21 65:20 68:3 71:21 2000 41:4,7 2001 65:14 2002 67:6,7 2006 66:20 67:9 69:16 2007 65:8 2008 66:21 2010 41:7 2012 20:6 29:11 2013 10:5,5 42:18 2014 40:13 52:22 54:2 2015 1:17 2:7 3:1 20:1 28:21 29:19,25 31:16,17,17 32:23 32:25 33:2,18,18,21 34:2 39:14 45:4,6,9 48:8 53:3 71:21 210 9:21 21004 63:24 2111184 1:23</p>	<p>213 45:18 2241 2:5 23 44:23 58:11 24 32:25 45:4 24th 16:18 32:23 45:6 25 36:5 40:25 28th 21:12</p> <p>3</p> <p>3 32:22 43:11 45:3 3,000,979 60:7 30 21:18 26:7 27:24 53:25 62:22 300 9:23 304-5424 45:18 31 39:14 31st 33:1 32 21:8 67:17 323 45:20 35.3 41:5 37 28:6</p> <p>4</p> <p>4-4 52:18 40 28:6,6 69:7 400 34:4 53:4,6 4118 22:17 42 64:20 43.9 52:19 45 13:16 16:19 53:18 54:9 460 8:17 10:5</p> <p>5</p> <p>50 8:14 9:13 30:21 34:5 50:14 52 67:15,19 54235 61:19 62:8 54237 50:3 64:2 55.4 40:16 56 41:5 57 41:4</p>	<p>6</p> <p>6 1:17 2:7 3:1 60 13:17 16:19 27:17 60s 8:15 63 28:6 660,000 65:19 6:16 2:6 3:2 6th 28:21 31:17</p> <p>7</p> <p>7 28:23 29:4 31:16 7.7 40:25 70s 8:15 71 1:24 710 1:14 2:4 4:11 5:19 8:12 18:18 19:9,13,18 20:19 29:22 30:2 31:11,12 34:1,1,1 35:1 47:25 51:21 66:9 69:20 70:24 710propertysalesc... 17:6 718-1223 45:20 7th 29:25</p> <p>8</p> <p>8 68:25 84 10:19 85.4 52:18 8:04 2:6 70:25 8th 13:17 16:17,19</p> <p>9</p> <p>90 27:16,17 53:6 90012 28:24 990,000 60:13</p> <p>a</p> <p>ability 17:3,7 24:4 67:25 68:15 able 3:24 5:23 6:1 7:17 absolutely 24:19 accept 23:7</p>
---	--	--	--

<p>access 20:23 accommodations 43:11,13 accomplish 68:8 accomplished 68:22 account 10:15 accounted 40:22 41:5 accurate 34:22 acknowledgment 40:8 acquainted 53:22 acquired 19:10 62:14,16 act 32:5 38:21,24 39:17 44:25 50:3 61:13 63:5 65:7,9 acting 29:2 action 5:20,25 9:8 11:16 13:7,13 14:6 14:11 21:16,20 23:1 39:9 65:24,25 67:2 71:16,17 actions 15:7 21:21 38:22 active 53:21 activities 62:18 actual 50:5 58:14 add 26:7 32:22 45:3 added 57:12 addition 20:9 30:3 34:4 64:12 67:19 additional 32:22 33:2 34:3 45:3,11 52:8 address 17:2 33:10 36:17 38:5 42:9 53:1,6 65:3 addressed 22:24 27:1 42:17 69:20 adjoining 49:13 administered 71:6 administrative 32:5 39:17 65:6,9</p>	<p>adopt 64:22 adopted 10:11 11:2 19:21 advantage 17:21 adverse 15:9,22 advisory 35:21 advocate 27:20 advocated 69:17 affairs 4:21 affect 26:13 38:23 41:24 55:1 affirmatively 62:23 affirmed 20:8 afford 14:20 19:24 38:1 43:2 61:2 affordable 9:9,18 10:7,24 14:19 19:25 20:3 29:13,16,20 35:24 38:11,15,16 42:25 43:3,22 49:6 49:10,16 61:3,5,18 62:1 aforementioned 31:8 afraid 68:9 afternoon 66:13,16 agencies 14:9 35:23 38:21,25 62:11 69:9 agency 9:11 29:3 35:17 59:14 63:7,25 agent 25:6 57:9 agents 56:18 ago 8:14 41:4 62:22 62:22 64:19 69:7 agrees 27:13 ahead 3:6 4:9 23:14 56:21 67:21 alarming 33:13 alignment 22:14 allison 4:21 12:23 12:24 13:1 16:8,17 48:13 allow 7:23 20:25 25:18,19 33:6 64:13 69:9</p>	<p>allowed 27:22,23 49:23 allowing 20:4 48:24 64:10 allows 17:11 63:24 64:3,4 almeida 26:3,6,6 27:4 55:6,9 alternate 23:1 alternative 11:19,21 11:23 13:22 14:6,11 14:12,13,22 15:8 21:17 22:19 63:1 68:21 alternatives 6:19 7:13 8:25 9:2,8 11:14 39:2 amended 14:9 amendment 63:5 american 46:13,13 amount 10:1 49:21 amounts 31:2 analysis 13:7,14 48:16 53:7 63:10 analyze 38:22 52:6 66:19 angeles 1:16 2:5 3:1 9:22,24 24:8 28:24 32:18 34:7 38:12,14 67:12,14 68:2,7 anglo 37:19 animus 70:6 ann's 26:24 anniversary 36:7 announcement 3:19 22:1 announcing 31:16 annual 20:9 answer 23:14 anticipate 14:17 anticipated 35:13 anybody 18:25 24:8 55:13 62:1 anymore 26:25</p>	<p>anyway 55:8 56:16 56:21 anyways 46:9 apa 32:5 apologize 46:10 apologized 18:22 apparent 48:5 apparently 51:1 appear 18:8 appearance 46:10 appendix 33:20 applied 10:23 applies 58:20 appointee 68:4 appreciate 45:14 approached 63:4 appropriate 32:2 42:12 appropriately 17:15 approval 19:10 approved 67:20 april 48:8 architecture 37:14 area 9:20,23 10:2 15:2 43:24 49:24 58:20,23,25 59:3 64:4,5,7,8 areas 49:20,25 50:15 arellano 4:16 arrest's 5:14 arrive 35:8 article 62:12,15,15 articulated 12:13 articulates 36:16 asbestos 16:3 58:17 58:17 aside 10:15 64:12 asked 18:24 19:1 51:5 56:12 asking 7:25 32:21 asp 32:20 49:7,8 asphalt 59:1 assemblyman 66:23</p>
---	---	---	---

[assemblyman's - calls]

<p>assemblyman's 66:23 assemblymember 43:19,20 45:21,24 asserts 36:19 38:20 assessment 29:21 assimilate 31:6 33:7 assist 10:15 39:24 assistance 35:21,22 63:9,14 assistant 29:6 associated 11:20 associates 4:17 association 18:19,19 19:17,18 assuredly 31:24 attached 53:3 attempt 32:4 attending 53:24 attention 19:8 attic 56:24 attorney 29:1 47:25 71:17 attractive 37:13 audit 20:6 august 1:17 2:7 3:1 4:15 16:18 28:21 31:17,17 32:23 33:1 45:4 70:20 71:21 available 32:2 33:19 35:18,19 43:15,17 avenue 2:5 52:14 average 34:24 avert 36:21 avoid 15:14 35:15 36:21 avoided 14:8 39:4</p>	<p>49:3 50:22 52:9,25 55:21 57:17 58:3 60:3,5 63:3,3 65:14 69:2 background 24:1 bad 57:7 barred 63:13 base 3:11 22:20 based 16:3 21:18 22:20 32:15 33:18 50:5 basic 11:14 21:10 basically 9:20 10:1 10:6 11:14 12:10 24:2 bb 70:14 bear 33:8 34:23 becoming 41:13 beginning 2:6 behalf 18:21 29:9 52:15 behavior 37:14 behold 56:22 believe 14:23,25 15:3,8,24 16:5 33:5 34:9 50:22 51:6 59:17 believes 31:1 34:21 35:2 68:8 benefit 16:11 43:4 benefits 63:9 benign 69:8,11 70:7 bensley 5:4 best 45:16 better 24:15 25:13 28:8 beyond 42:21 51:20 bi 43:16 bid 65:16 big 26:21 69:25 bigger 55:15 60:1 bill 9:16,17,18 10:18 10:19,20 18:24 19:21,21 64:2 66:1</p>	<p>bills 53:16 bit 6:11 9:17 12:18 13:4 25:17 55:15 blatant 35:3 bleed 46:25 47:1,2 blight 20:5 block 26:15 58:22 blocks 60:9 blood 47:1 blown 59:20 blue 3:25 5:3,22 67:23 board 21:8,9 22:7 boards 5:8,9 6:15 52:24 69:2 70:23 body 33:20 bogus 67:18 bone 47:14,15 books 46:15,18 borderline 56:3 born 46:22 bought 60:10 61:4 65:19 66:2 bowen 29:4 box 3:25 5:22 boyle 32:17 brent 29:5 39:14 brian 29:2 42:19 bricks 60:1 brief 31:19 bring 8:6 37:8 44:13 bringing 19:14 20:5 britt 3:4 4:16 16:8 21:2 23:9 26:2 27:3 28:17 30:8,13 32:9 34:12 36:1 38:7 40:1 41:15 44:21 46:1 47:22 51:8 52:11 54:6 55:5 58:4 61:15 68:13,23 70:16 broken 25:3,16 brokers 55:24 brought 52:24</p>	<p>brown 10:5 28:25 68:7 bsa 42:21 buenos 32:12 build 63:1 building 62:24 buildings 37:6 built 59:25 bunch 23:24 bundled 65:15 bureau 40:13 business 29:3 44:9 44:12,12,16,16,16 64:14 businesses 39:23 businessman 44:7 busy 47:4,7 buy 8:15 43:2 50:4 55:20 56:2 63:21 64:10,13 buyer 15:18 buyers 35:18 37:7 buying 8:14 10:10 56:25 buzzer 18:10</p>
b			c
<p>b 12:6,10,10 baby 57:25 back 3:25 4:3,6 5:2 5:5,15,22 8:3 14:5 16:7,21 17:1,8 36:8 46:12,13 47:3 48:3</p>			<p>calculated 33:13 calculation 34:21 35:8 calendar 22:4 california 1:16 2:6 3:1 18:19 19:5,8,20 28:24 29:3 35:16,17 38:12,24 40:14,17 41:2,22 42:1 49:23 62:13 71:2 call 7:17,21 28:13 28:14 called 56:13 60:6,25 65:11 69:8 calling 18:5 28:15 callous 38:18 calls 20:6</p>

[calm - communities]

<p>calm 57:14 caltrans 4:18,21 8:10 9:10,11 11:16 13:2 17:10 18:18 19:17 20:1,2,3,6,11 20:13 21:17 22:2 23:17,23 24:2 26:11 26:13 28:7,22 29:1 29:4,10,12,13,19,20 29:25 30:1,1,3,18 30:23,25 31:4,5,10 31:13,18 32:1,2,4 32:20,21,22,25 33:2 33:9,13,14,17,19,20 33:22,23 34:8,16,21 35:3,4,6,8,10,16,22 36:4,7,11,12,14,17 36:20 37:23 38:3,18 39:4,11 42:9,14,16 42:19,22 44:17,24 45:3,7,8,9,10,11 47:6,7,25 48:1,4,8 48:12,19,23,23 49:3 49:5,15,19 50:7,11 50:14,15,18,20,21 50:23 51:1,4,5,11 51:14,20 52:4,14 53:11 54:2,14 55:3 55:9 56:6 57:7 59:9 60:20 61:12,13,23 61:24 62:18,19,20 62:22 63:1,4,6,14 63:15,19,24 64:3,4 64:5,16,19 65:8,15 65:19,24,24 66:4,15 66:17,18,19,20,21 66:24,25,25 67:5,11 67:12,14,16,21,25 68:2,4,7,10,15,19 69:9 cano 34:13,14 36:2 36:2 38:7,8,9,9 40:1 card 3:17,21,22 7:20 23:9 26:12 27:2 46:3</p>	<p>cards 4:25 17:24,24 care 26:21 44:19 47:18 54:10,16 55:3 59:10 carino 34:13 carol 43:20 45:24 carrie 29:4 case 13:7 14:13 22:20 26:10 65:9 71:12 categorized 17:15 cause 15:21 37:15 caution 66:12 cc 28:25 45:21 cd 28:5 30:2,4,7,20 33:1 45:7 53:3 census 40:13 center 41:7 cents 65:20 century 62:25 ceo 44:15 ceqa 38:4,25 39:8 51:22 52:8 63:24 66:11 certain 58:18 69:9 certainly 11:9 certificate 57:3 certified 2:7 41:19 41:22 43:12 71:1 certify 71:2,15 cetera 58:12 chain 25:25 challenge 43:7 challenged 52:21 53:24 change 11:18 37:17 37:21 38:2 42:24 45:1 changed 21:20 55:22 character 14:15 37:12 44:4 characterized 61:25 chat 9:17</p>	<p>chavez 55:12,14,16 58:3 cheaper 22:14 check 68:25 chester 4:16 8:8 16:7 40:3 chief 29:5,6 child 54:15 children 28:14,15 54:23 57:23,24 children's 57:24 choose 13:22 64:23 choosing 49:22 chris 43:20,21 45:24 55:21 christopher 46:2,2 47:22,24 58:5 61:15 69:15 church 43:9 53:22 53:23 54:25 circulating 51:17 circumstances 29:18 34:20,24 cite 39:15 cities 35:1 citing 42:21 citizen 19:6 54:10 city 9:23 32:15 38:12,13 44:8 45:22 65:10 clarifying 5:10 clarity 32:19 39:22 class 31:3 34:20 37:11 classic 36:23 clear 31:21 39:4,7 cleopatra 49:9 close 9:22 13:20 52:1 clothing 46:11 club 21:8 22:8 code 9:19 39:17 57:5 57:8 61:20 64:15,16 codes 64:6</p>	<p>coherent 36:15 coined 69:8 collaborative 32:14 collect 3:18 18:1 46:4 collecting 4:24 color 47:1 columns 60:2 combine 37:8 come 7:2,18 8:3 18:2 28:6 47:7 48:2 50:2,3 52:9 53:19 56:21 57:19 59:22 70:11 comes 34:9 57:9 comfortable 7:9 17:20 coming 5:17 40:20 comment 3:16,22,23 3:24,24 5:22 6:12 7:15,19 8:3,3 16:9 16:22,24 17:7,11,11 17:17,23,25 18:13 21:5 23:18,21 25:25 26:12 27:2 31:9,25 32:24 33:4 39:12 43:23 45:4,5 47:21 48:17 55:7,11 56:11 68:14,23 69:4 70:16 comments 6:4,5,6,6 6:8,9 7:17,24 8:2 13:21,21 16:10,11 16:13,14,16,24 17:3 17:13,14,22 19:3 26:3 31:21 32:23 36:9 47:17 48:2,18 48:20,22,22,25 51:8 52:1,8 66:13,15 70:19 committee 18:18 36:5 communication 25:13 communities 19:10 19:17 20:5,8 38:19</p>
---	--	---	---

[communities - david]

<p>42:24 69:10 community 8:16 11:4,13 14:1,15 19:18 26:13,22 27:21 29:10 31:5,8 31:10,14,15,16,22 32:13 33:3 34:20 35:5,11 36:23 37:12 38:2,3,17 41:18 42:11,13 43:10,23 44:25 45:12 51:13 53:5,14,21 58:2 70:10,12 company 17:10 24:18 comparable 35:10 35:22 compared 34:25 competent 67:6 compiled 6:8 complained 42:14 complete 68:1,16 completed 19:19 53:10 completion 71:13 complex 12:19 33:8 39:19 complexity 39:22 40:8 comply 9:16 32:4 39:20 comprehend 29:23 30:6 31:6 computer 28:13 computers 17:21 28:3 concedes 31:18 conceived 29:12 concepts 70:9 concerned 22:22 29:15 concerns 7:12 16:10 29:18 concluded 70:25</p>	<p>conclusion 45:2 conditions 41:24 conduct 31:13 33:9 42:23 48:10 conducting 13:14,14 conflict 37:10,16 confusing 11:9,10 21:12 33:13 39:20 congratulated 37:19 connection 60:21 connects 60:4 consequence 69:12 consequences 69:9 consideration 40:12 59:5 considered 15:12 22:22 67:23 consistency 14:7 consistently 49:19 50:7 conspiratorial 61:9 61:12 constitution 62:13 62:16 constructed 62:23 construction 9:1,2,5 consultant 4:18 5:4 consultants 42:16 consulting 70:12 contact 3:14 contacted 33:23 contain 16:2 30:21 contained 29:24 30:6 31:7 33:12 containing 16:3 53:4 context 34:6 35:2 continually 48:9 continuation 32:18 44:23 continue 11:15 40:5 continued 41:10 42:15 continues 19:19 42:17 44:24</p>	<p>continuing 15:8 22:25 34:16 continuous 51:1 contractors 24:24 50:19,21 51:13 contrary 63:12 contribute 15:23 38:15 control 59:12 61:12 conversation 23:21 convey 12:16 conveying 12:8 copy 32:3 45:9 48:4 48:12,15,18,20 66:13 corner 26:18 47:3 60:19 corridor 12:2 35:1 47:25 48:2 60:4 61:11 62:21 64:7 67:22 corrupt 51:11 cosigners 55:24 cost 20:13 24:24 60:13 costs 64:8 councilmen 27:21 counsel 5:14 21:8 22:7 45:22,23 count 18:10 26:17 counted 26:16 country's 40:16 county 40:17,18 49:5,11 couple 11:21 58:16 70:14 couples 37:6 course 43:21 58:22 court 6:4 18:3,6 41:24 65:8 67:20 70:18 courts 41:21 covenant 15:20,20 covenants 15:14,15 66:1</p>	<p>cover 32:6,7 58:18 covered 59:1,2 craftsman 59:20,25 60:11 craftsmens 26:22 created 36:18 creates 25:22 cespo 52:12 54:7,7 crime 19:14 criminal 51:7 crisis 36:13 38:16 criteria 42:25 49:12 crop 67:9,10 cruel 44:12 csr 1:22 71:25 cultural 14:1 15:10 culture 37:11 46:14 cumulative 14:2 15:23 curious 24:3 current 53:12 currently 8:20 13:17 35:19 cut 47:1 cutoff 48:23 66:14 cuts 48:20</p>
d			
<p>dad 57:17 damage 20:11 damn 27:25 daniel 69:7 data 3:11 42:8 49:5 49:10,12,17,17,20 49:20,22 50:8,12 63:20,20,20 date 16:18,20 28:21 33:23 71:18 dated 39:14 42:17 71:21 daughter 54:10,19 54:21,23 58:11 daughters 57:19 david 18:21 19:4</p>			

<p>davis 68:5 day 13:16 44:24 53:6 55:21 59:15 days 13:17 16:19,19 27:16,17,17 de 31:2 45:21 59:22 60:6 deadline 32:23,24 45:4 deal 21:20 42:9 66:4 66:5 dealing 9:20 dean 41:9 decedent 19:22 december 29:11 decide 64:17 decided 64:21 decides 55:19 decision 7:1,3,4 9:4 9:6 decisions 64:25 declare 10:6 declares 62:9 decline 37:3 decorating 57:3 deep 46:22,23 deeply 46:14 defective 48:24 defendant 41:23 defendants 41:25 defined 33:11 36:16 definite 53:20 deir 13:5,13,15 14:4 16:6 29:17 30:20 31:11,14,15,22 32:2 32:20 33:2,12,20 34:1,1,2,4 35:11 45:7,11 48:10 51:20 51:21,23,25 52:16 52:18 61:17 62:25 68:17,21 deirs 51:21 delivered 66:20,21 66:24</p>	<p>demanding 64:22 demographic 40:11 40:20 demolished 19:12 demonstrate 20:12 denied 30:24 department 19:9 35:16,23 deposition 71:12 deputy 8:9 28:22 33:23 describe 6:25 deserve 44:5 desirable 37:13 destroys 62:19,20 detail 14:5 details 36:16 develop 64:17 developed 14:20 development 15:6 35:24 developments 29:15 differences 37:11 different 23:1 47:3 61:7 differential 31:1 difficult 12:18 22:9 44:8 digits 44:1 direct 23:5 directed 30:16 31:2 31:3 40:9 direction 71:8 director 4:20 28:22 29:2,4 33:24 66:20 66:22,24 69:20 directors 66:25 disabled 20:23 54:4 54:11,15 55:3 disadvantage 39:25 disclose 27:15 35:7 disclosing 27:7 disclosure 13:6 discovered 12:24</p>	<p>discretionary 64:1 discriminating 54:3 54:14 discrimination 31:3 35:3 discuss 13:6 dishonest 48:9 dislocating 55:10 dislocation 61:10 displace 36:14 49:3 51:12,25 displaced 15:1 20:16 33:14 34:24 35:9,13,15 37:20 48:12 50:11 52:23 53:5 62:24 63:13 68:19 displacement 14:16 33:16 36:22 49:21 50:12 62:9 64:9 65:4 66:5 displacements 34:17 39:7 displacing 19:13 62:2 63:19 disposed 16:6 disproportionate 34:19,23 disqualified 49:22 disregard 38:18 disrepair 20:5 disseminated 43:15 distinct 39:25 district 5:14 28:22 28:23 29:4 33:24 dividing 19:15 division 28:23 29:5 29:6 document 3:10 5:21 5:23,25 6:9,10,16 6:21 11:11,12 13:6 13:23,25 16:14,15 19:2 32:8 34:4 38:13 48:7 51:9,10 51:17 53:4,4</p>	<p>documentary 44:7 documentations 47:11 documented 30:3 documents 17:4 21:12 23:8 25:18,20 29:24 31:8 32:21 33:8 52:7 dogs 59:17 doing 5:18 7:9 11:15 11:18 47:6,7 50:17 51:2 56:6 61:6 dollar 65:20 dollars 60:18 domain 19:12 dominate 70:12 don 18:14,16,17 68:23 door 67:7 doors 4:6 doubt 25:22,23,23 25:24,24 70:3 doubts 25:23 doug 69:21 dougherty 29:1 42:19 dr 18:15,16 21:3,5,7 21:7 draft 4:12 13:2 20:1 20:15 29:17 30:1 31:10 48:4,6,15,16 50:10 63:10,11 64:25 66:6,8 drafted 48:8 dragged 68:3 draining 68:18 drir 33:18,18,21 34:2 45:9 48:10 52:22 53:3 54:2 drir's 33:25 drive 49:13 70:13 drives 49:11 driveways 50:25 due 14:16 16:1 34:20,24</p>
--	---	---	---

[dump - extricate]

<p>dump 58:24 59:2 duty 61:23 dwellings 52:16</p>	<p>44:25 45:12,16,20 46:22,22 52:17,18 54:8 55:10</p>	<p>17:12 19:2 20:1 24:10 28:23 29:17 30:1 31:11 36:8 38:20,22,24 50:10 51:9,10 59:4 62:12 62:17 63:11,18,22 63:25 64:9 65:4 66:5,18</p>	<p>eviction 20:14 33:17 evictions 37:2,3 evidence 30:3 69:21 evil 61:9 exacerbated 37:11 examine 25:18,19 example 16:21 60:15 exception 30:4 excess 8:23 10:7 excluded 48:5 exclusively 41:12 excuse 27:25 46:24 68:13 executives 65:18 existence 65:17 existing 19:25 37:7 exorbitant 25:5 exorbitantly 66:2 expand 15:4 expansion 19:13 59:19 expect 46:9 expedite 67:3 expedited 24:11 experience 22:10 experiencing 38:14 experts 39:24 explain 6:2 28:4,10 42:24 64:17,22 explained 6:11 43:3 explaining 7:6 explanation 64:21 expression 44:16 extend 32:24 45:5 extended 13:16 16:18 extends 60:3 extension 19:18 21:11,22 39:10 53:6 extensions 39:12 extremely 18:11 extricate 9:13</p>
<p>e</p>	<p>elbow 41:23 elderly 20:22 54:3 54:14 elected 42:15,18 element 10:13 21:10 eligible 10:7 elisa 26:3,6 52:12 54:6 55:5,9 57:14 emerge 37:12 eminent 19:11 emotion 44:14 emotional 47:19 54:22 emphasized 19:22 employee 71:16 employee's 68:11 employees 50:23 51:14 empty 50:24 encourage 15:5 engagement 31:10 english 31:7 32:3 33:3,22 40:9 42:3 43:7,8,10,14 45:10 45:12 enormous 59:18 60:2 entire 22:13 49:5 65:6 entities 65:12,25 entitle 63:17 entitled 63:8 entity 10:8 61:4 65:14,17 environment 13:8 27:19 38:24 39:1 58:14,14 environmental 4:12 4:20 5:21 6:2,9,20 6:25 7:5 8:10 11:11 11:12 12:23 13:1,3 13:23 16:10,12,14</p>	<p>envisioned 44:11 equipped 9:12 escrows 10:10 esoc 42:14 45:20 especially 8:24 39:6 40:10 esperanza 60:25 65:14,23 67:18 essence 30:23 essentially 13:5 established 33:4 38:21 establishing 44:9 estate 50:1 55:22 60:22 estimate 33:17 et 58:12 ethnic 20:22 evacuate 60:23 evaluate 48:11 61:23 evaluated 13:25 50:9 66:6,10 evaluation 59:8 evening 3:4 12:25 21:7 23:16 event 15:18 22:4 eventually 67:16 everybody 27:5,12 46:5,10 56:14 everybody's 28:1 everyone's 8:4 18:13 evict 37:7 66:3 evicted 53:8 65:23 69:13</p>	

[faces - goes]

<p>f</p> <p>faces 58:22 facilitate 15:5 facility 69:1 facing 19:7 fact 16:1 21:13 42:17 62:3,7 63:22 69:14 70:2 facto 31:3 factors 14:1 59:4 failed 32:1 33:9 42:22 52:6 failing 20:9 61:23 69:21 fails 62:25 65:24 failure 39:5 fair 42:11 faith 25:21 fall 20:5 37:24,24 families 19:23 34:8 37:5 41:14 48:11 49:4 52:22 53:5 61:1 63:12,19 65:22 69:13,17,23 family 10:16 55:3 57:14,16 far 24:15 25:21 26:10 47:6 55:20,22 fast 12:12 24:15 40:10 faster 22:14 68:1 father 46:21 father's 46:14,23 fax 3:12 fe 58:24 59:3 federal 38:21 63:16 67:20 71:12 feel 7:9 17:20 37:22 47:6,19,19,21 54:14 55:11 feels 47:13 feet 57:20 68:3 fellows 32:13</p>	<p>felt 12:20 fences 60:15 fico 56:3 fifth 25:24 figures 40:19,21 44:1 file 26:14 27:9 28:3 filed 36:7 65:10 fill 3:18 7:20 filled 46:7 filling 16:24 final 6:9,10 13:23 16:13 52:2 finally 15:24 17:22 finance 35:17 financial 34:20,24 financially 71:15 financing 35:14,18 find 8:22 14:4 16:4 22:1,5,9 26:19 27:17 28:15 35:10 35:21,24 finding 6:24 findings 13:4 14:3 finds 62:8 fine 68:15 finished 52:1 first 4:14 18:14 21:11,15,16 67:9 five 11:24 12:3,7 22:17 54:12 56:15 56:15 67:4 68:18 fix 25:7,15 fixing 25:15 flooring 58:16 flores 39:14 45:17 focus 16:10 51:9 focused 10:22 16:15 fold 55:5 foliage 58:23 folks 70:5 follow 36:9 66:7 followed 7:6 10:12 26:4 28:17 32:10 34:12 36:1 38:7</p>	<p>40:1 41:15 46:1 47:22 54:6 58:4 following 29:17 31:18 34:18 35:11 39:16 40:11 42:20 43:18 45:2 foregoing 71:3,5,9 71:11 forest 44:3 forgot 45:19 form 16:24 formal 6:3 31:20 formatting 23:5 formed 29:11 former 65:18 forth 59:10 60:15 71:4 forward 40:10 68:10 found 6:20 59:12 65:8 founded 65:18 four 52:24 fourth 25:24 fowler 1:22 2:7 71:24 frail 32:4 francis 56:17 frankly 68:7 fraudulent 48:9 freeway 9:21 19:13 52:1,5 58:22 59:16 60:9 62:25 66:9 freeways 50:15 fremont 60:16 frequently 39:18 friend 60:10 friendly 23:7 friends 55:2 front 4:24 69:19 fuelled 41:11 full 66:13,15 funders 32:14 funds 10:14</p>	<p>further 26:17 62:8 68:20 71:11,15 furthermore 30:18 35:5 future 12:2 21:21,21</p> <hr/> <p>g</p> <p>game 24:19 garcia 26:4,5 28:17 28:18,19,20 30:8,10 30:11,15,15 32:11 36:1,3,3 39:13 45:16,19 gas 62:14,16 gather 13:21 17:13 general 29:1 35:19 generally 16:4 generate 25:19 generation 41:13 generations 57:15 57:16,22,23 58:2 gentrification 36:23 36:24 37:10,15 geographic 49:19 50:8 64:8 getting 67:6 gist 5:14 give 5:24 6:17 8:7 22:17 24:19 56:19 given 41:21 42:7 44:4 48:14 54:17,19 71:10 giving 6:21 gmail.com. 45:20 go 3:6 4:7,9 5:16 6:12 10:9 17:5,13 17:17,18 21:10 22:12 23:14 26:17 26:18 28:4,9 35:10 36:25 46:12,18,22 46:23 56:1,16,20,24 56:24,25 68:10 69:1 god 21:18 goes 55:13,20</p>
--	---	--	---

[going - hud]

<p>going 3:6 4:9,13,14 4:19 5:18,20 6:8,16 6:17,24 8:6,7 10:9 12:22 13:3 14:18 16:7,9,20 17:23,25 18:11 21:3 22:9,12 23:13 24:12 25:1,18 27:14,14 30:9 36:9 36:14,17 37:24,24 37:25 47:14 50:11 51:24,25 55:7 56:21 58:3 60:16 63:3 64:18,19 65:1,2 67:1 68:10 gomez 43:19 45:22 good 12:25 21:7,20 23:16 54:16 56:3 gotten 70:20 government 53:15 53:16 61:20 governor 10:5 28:25 67:1,11 68:5,6,6 governor's 67:2 68:4 governs 62:15 grab 3:5,12 5:1 23:12 grabbing 3:7 gradual 11:24 gradually 12:3 graduate 41:9 grandchildren 54:23 grandkids 57:21 grant 39:10 granted 39:11 graphic 13:10 great 18:7 green 3:17 29:5 39:14 grevelia 58:21 65:23 grew 57:25 grotesque 59:19 ground 67:8</p>	<p>group 48:1 52:22 groups 19:18 grown 41:3 growth 14:1 15:2,3 15:7 41:6,11 guess 22:17 guided 34:7</p> <hr/> <p style="text-align: center;">h</p> <hr/> <p>half 22:3 54:9 56:23 halt 67:8 hand 4:20 5:3,5,16 16:7 48:12 handed 17:4 handled 16:5 68:11 handouts 22:6 handwrite 3:23 happen 21:1 60:9 happened 24:22 57:25 happening 11:19 25:14,14 46:24 55:14 happens 24:10 happy 56:9 harbinger 41:2 hard 19:16 32:3 44:12 46:25 51:17 harris 28:25 hazardous 14:2 16:1 19:14 hazmat 58:15 hcd 49:23 64:3 he'll 4:24 5:1 18:1 head 66:25 67:10 68:4 heads 30:22 health 38:18 healthy 32:13 hear 3:4 7:8 55:6 heard 16:11,17 44:7 hearing 1:15 2:5 4:19 5:7,18 23:13 47:10 70:25</p>	<p>hearings 4:13 13:17 31:17,21 heater 57:6,10 heaven 57:18 heavily 60:17 heights 32:16,17 held 15:17 48:10 hello 8:9 28:19 46:5 help 3:9 5:9 15:15 17:12 21:18 53:20 53:20 67:16 helpful 3:15 helping 10:16 hernandez 40:3,5 43:19 45:23 hgarcia4432 45:20 hi 26:6 34:15 40:3 44:22 higher 37:8 highly 23:6 highway 64:15 highways 9:18 64:16 hikes 29:12 37:1 53:9,9,11 hilda 45:23 hire 39:24 43:12 50:18 hired 17:10 hires 50:21 hispanic 52:19 historic 15:11,12,13 15:16,19,22 19:15 34:6 historical 26:14,20 26:24 27:1 historically 34:6 history 46:13,15,18 47:20 63:3 hogging 58:6 hold 3:5 33:2 65:10 holden 43:20,21 45:24 holds 45:11</p>	<p>home 4:2 25:6 37:2 54:18,20 57:1 homeless 36:13,18 57:19 homelessness 36:21 homes 14:17 15:12 26:11,14,15,20,24 38:1 49:14 53:13 54:5 58:20 60:23 61:4 69:13,19 honest 24:20 honesty 25:17 hopefully 13:23 hour 22:3 house 26:10 27:25 28:4 33:15 37:4 43:2,2 46:21 53:10 54:16 55:20 56:2,4 56:25,25 57:4,6,12 57:13,20 58:14,18 58:21 59:20 60:6,8 60:11,18 64:11 household 34:17 37:5 39:7 households 20:16 27:7,8 30:21,22 33:2,14 34:22 35:12 36:12,22 45:8,10 houses 8:13 9:12,22 9:23 10:3,14,16 11:6,16,23 25:5,15 27:25 37:22 50:5 51:3 57:5 60:8 61:21,22 housing 9:9 19:7,23 20:3 29:3 35:10,17 35:22,23,24 36:17 38:11,15,16 43:22 52:6 55:19,19 61:3 61:5,18 62:1,4,20 62:21,24 63:1,14 64:8 65:14,23,25 hud 35:24 49:24 64:3</p>
---	---	---	---

[huge - justified]

<p>huge 59:24 60:1,1,2 60:2</p> <p>hugo 30:10 32:11 36:1,3 39:13 45:16 45:19,19</p> <p>huizar 45:22</p> <p>human 38:23</p> <p>hundred 19:13</p> <p>hundreds 62:23,23</p> <p>hurts 46:20</p>	<p>imperative 42:4</p> <p>implications 12:24</p> <p>important 12:20 39:10 68:20</p> <p>imposition 29:12</p> <p>improve 23:6</p> <p>improved 57:12</p> <p>improvement 9:5</p> <p>improving 37:19</p> <p>inability 66:4,5</p> <p>include 12:21 13:8 13:25 31:19 62:25 64:5</p> <p>included 48:16</p> <p>includes 9:15</p> <p>including 7:12 28:11 37:13 43:14 67:17</p> <p>income 10:17 19:24 20:22 37:5 49:5,10 49:15,20,24,25 50:2 50:5,5,7,16 54:10 55:25 63:20 64:4,5 64:7,7 68:18</p> <p>incorporation 15:25</p> <p>incorrect 46:15</p> <p>increase 35:13</p> <p>increases 37:2,3 69:18</p> <p>indian 55:13</p> <p>indicate 39:2</p> <p>indicated 70:6</p> <p>individuals 10:17 31:20</p> <p>inducing 15:2,3</p> <p>industry 65:19</p> <p>influx 41:10</p> <p>inform 32:1</p> <p>information 3:13,15 5:11 6:14,18,21,24 7:12 23:24 30:25 31:14 41:10 43:6,15 64:24 70:21</p> <p>informed 31:25</p>	<p>inhabitability 20:10</p> <p>initials 49:7</p> <p>initiation 29:13</p> <p>initiatives 20:19</p> <p>injunction 67:21</p> <p>inner 32:15</p> <p>input 7:7 11:3,5 23:5</p> <p>inputs 23:5</p> <p>inside 57:6</p> <p>insistence 63:6</p> <p>inspect 56:14,21 57:9</p> <p>inspected 57:11 58:15</p> <p>inspection 25:7 56:13</p> <p>inspections 20:10</p> <p>inspector 56:23,23 56:24</p> <p>inspectors 56:18</p> <p>instance 35:3 51:11</p> <p>institutional 31:2</p> <p>insubordinate 67:14</p> <p>intact 38:3</p> <p>intangibile 36:20</p> <p>intellectually 52:21</p> <p>intended 9:8 20:2</p> <p>intent 13:12 15:13</p> <p>intentional 70:7</p> <p>interest 41:25 42:2</p> <p>interested 6:23 43:21 71:16</p> <p>interesting 18:23 52:23 53:2</p> <p>interior 57:3</p> <p>internal 69:19</p> <p>interpreted 42:5</p> <p>interpreter 41:19,23 43:12</p> <p>interpreters 42:5</p> <p>interrelationship 52:7</p> <p>intimately 51:22</p>	<p>introduced 8:16 69:21</p> <p>introduction 5:12</p> <p>invoke 64:3</p> <p>involve 15:6</p> <p>involving 29:16</p> <p>ironically 40:7</p> <p>issue 21:25 33:1 38:5 40:7 45:7,9</p> <p>issued 29:19,25</p> <p>issues 7:11 11:20 12:20 16:15 20:10</p> <p>item 6:25</p> <p>items 4:5 5:10</p> <p>iwasaki 66:22</p>
<p>i</p>			<p>j</p>
<p>idea 59:19</p> <p>ideas 37:12</p> <p>identified 10:21 20:15,20 54:2 67:4</p> <p>identify 8:21 38:25 39:1</p> <p>identifying 10:10</p> <p>ignored 30:24 34:8 56:5</p> <p>illustrates 38:18</p> <p>imitation 59:25</p> <p>immediately 12:12 12:14,15 22:16,19</p> <p>immigrant 30:23</p> <p>immigrants 41:13</p> <p>immigration 41:12</p> <p>impact 4:12 9:3 13:3 14:23 15:23 19:2 20:1,15,18 26:12,21 29:17,21 30:1 31:11 34:19 35:12 36:12 38:6,22 48:5,15 50:10 63:10,10,11 63:18,18,23,25 64:2 64:9 66:6</p> <p>impacted 8:25 30:19</p> <p>impacting 69:10</p> <p>impacts 6:20 11:6 11:12 14:7,15,18 15:2,3,9,14,25 22:23 35:11 37:9 65:4 66:18 68:20</p>			<p>jack 37:25 65:21</p> <p>james 67:11 68:5</p> <p>jargon 29:24 30:6 31:7</p> <p>jargons 47:13</p> <p>jennifer 29:6 30:10 32:10,13 39:15</p> <p>jerry 28:25</p> <p>jimmy 43:19 45:22</p> <p>job 1:23</p> <p>joe 18:15,16 21:2,3 21:3 34:13,14 36:1 38:7,9</p> <p>john 69:25</p> <p>jointly 66:10</p> <p>jones 18:14,16,17,17 68:23 69:5</p> <p>jose 5:14 45:22</p> <p>julio 5:13,14</p> <p>july 13:15 29:19,25 31:16 40:13</p> <p>jump 70:13</p> <p>jumped 40:25</p> <p>june 13:12</p> <p>justice 36:8 37:18</p> <p>justified 33:6,17</p>

[kamala - low]

k	<p>land 13:25 29:5,7</p> <p>landcaster 50:6</p> <p>landlords 59:13</p> <p>lands 46:17</p> <p>landscaping 37:14</p> <p>language 30:20 33:1 39:18,19 40:9,9 43:6,8,16 45:7</p> <p>languages 51:16</p> <p>laptop 28:10</p> <p>laptops 17:9</p> <p>large 37:2 58:25 62:9</p> <p>largely 13:6</p> <p>larger 50:3 64:10</p> <p>largest 40:17</p> <p>lastly 9:15 41:8</p> <p>latino 31:3 33:11 35:5 40:16,17,24 41:3,18,18 42:10 43:10 52:19</p> <p>latinos 40:14,22 41:3,4,5,11</p> <p>law 7:5 56:5 61:17 61:19,25,25 62:1,3 62:7 63:4,12,14,16 64:12</p> <p>laws 64:13</p> <p>lawsuit 36:6,7</p> <p>lawsuits 69:22</p> <p>lawyer 51:17</p> <p>layer 58:15,17</p> <p>layers 58:16</p> <p>lead 4:18 5:3 16:3</p> <p>leads 25:23,23,24,24</p> <p>leafs 44:3</p> <p>leak 25:2</p> <p>leaking 50:25</p> <p>learning 6:22 7:4</p> <p>leave 3:9 4:1 51:5 53:7</p> <p>left 4:6,7 17:9 34:5 51:6 57:17</p> <p>legal 29:23 30:6 31:6 39:8</p>	<p>legislation 10:4,25 18:24</p> <p>legislators 43:18</p> <p>legislature 19:21 62:8 63:4</p> <p>lending 35:20</p> <p>lengthy 53:6</p> <p>leon 45:21</p> <p>lesser 10:1</p> <p>letter 28:3,21 29:9 30:12,16 32:18 34:16 39:13 42:17 42:20 43:18</p> <p>letters 17:1 28:5 32:6</p> <p>levels 49:15</p> <p>library 32:3</p> <p>life 41:25 42:2 54:9 54:11,18</p> <p>limbo 27:11,12</p> <p>limit 23:4</p> <p>limited 43:14</p> <p>lincoln 32:16</p> <p>linda 40:1 41:15,17 51:5 55:5 58:4 65:13,22 69:16,20</p> <p>line 22:12 25:13</p> <p>lines 37:17</p> <p>lingual 43:16</p> <p>linguistic 42:10 44:25</p> <p>linguistically 32:1</p> <p>linked 66:9,10</p> <p>list 13:24 64:20 67:15,19 68:10</p> <p>listed 22:3</p> <p>listening 47:9,9,17 47:18</p> <p>little 6:11 9:17 12:18 13:4 25:9,17,20 55:15 58:8 60:11,12 63:3</p> <p>liu 43:20 45:24</p> <p>live 27:10,23 40:14 43:23 44:6 50:6</p>	<p>51:3 52:14 54:8,19 58:25 61:2,3,21 62:2 63:22 64:14</p> <p>lived 53:17 54:18</p> <p>lives 63:6 70:9</p> <p>living 27:11,12,24 28:2 41:24 50:25 54:12</p> <p>lo 56:22</p> <p>loan 55:23 65:18</p> <p>loben 67:11,15 68:5</p> <p>local 14:7 42:14,18 49:25</p> <p>locate 15:18</p> <p>located 4:8 52:17 58:21</p> <p>location 10:23 17:6 17:18 63:17</p> <p>locations 5:24 50:8</p> <p>logic 32:6</p> <p>long 24:10 40:20 44:19 56:18</p> <p>longer 8:21 9:7 34:10</p> <p>longest 28:2</p> <p>look 5:23 16:12 24:8 28:1 57:9 59:20 69:2</p> <p>looked 3:13</p> <p>looking 23:1</p> <p>looks 3:17,21 18:15 26:3 34:13 55:14</p> <p>looming 36:13</p> <p>los 1:16 2:5 3:1 9:22 9:24 24:8 28:24 32:18 34:7 38:12,14 67:12,14 68:2,7</p> <p>lose 53:14 69:13</p> <p>loss 23:4 38:11</p> <p>lot 26:10 46:15 47:2 48:2 53:18 57:4,5 60:12 69:6</p> <p>lots 44:3</p> <p>low 10:17 15:9 19:23 20:22 37:5</p>
l	<p>la 21:8 22:23 32:15 32:17 40:17 45:22 45:22</p> <p>lack 32:19 39:22</p>		

[low - needs]

<p>50:16 54:10 55:25 lowden 29:6 39:15 lsa 4:17 5:2,3 ludicrous 36:14</p>	<p>maximum 50:12 maycrest 52:14 mean 23:22 27:10 43:1,12 44:2 56:8 58:6 59:21 69:12 meaning 62:12 meaningfully 31:9 means 28:9 49:8 62:2,13 median 49:24,25 50:2,2 64:4,5,7 meeting 4:25 6:13 11:5 16:25 21:23 22:1,2,7,8 56:9 70:20 meetings 7:2 11:4 31:18 42:23 43:17 megabyte 23:3 member 5:14 21:8,9 22:7 45:22 53:22 members 7:16 33:15 38:17 53:23 54:25 55:4 memo 67:12 69:16 69:19 men 58:15 mentally 53:24 54:11 mention 5:13 70:18 mentioned 5:19,21 6:15 7:17,20 8:24 10:18 16:8,24 17:19 metadata 48:7 metro 28:7 michael 23:17 42:20 michelle 26:4 28:17 28:20 microphone 7:18 18:3 58:7 mike 21:6 23:10 miles 42:20 million 40:13,14,16 40:21,23,25 41:5 60:14,18,19</p>	<p>mind 11:9 33:8 minds 47:8,8 mine 60:10 minimize 13:9 35:15 36:21 66:17 minorities 20:22 37:4 minority 37:20 50:16 minute 49:2 minutes 7:23 8:5 18:9 51:9 miranda 40:2 41:16 44:21,22 miscarriage 37:18 misdirected 33:25 mistake 68:9 mistakenly 61:17,25 mitigate 13:9 39:5 58:23 62:17 64:2,9 mitigated 14:8 39:3 63:23 64:1 mitigation 7:14 15:25 36:13 moderate 10:17 19:23 mold 20:11 mom 57:17,18 mom's 57:14,16 monday 13:19 18:23 62:6 monday's 22:2 money 25:7,12 41:25 50:22 51:2,12 53:17 59:8 61:14 62:15,16 70:13 monolingual 30:18 30:22 31:23 33:6 monstrous 59:19 months 32:22 45:3 50:20 57:21 morales 69:25 moratorium 53:9 morning 22:8</p>	<p>morrow 4:21 12:25 13:1 mother 52:21 53:17 54:1 mother's 55:7 move 37:7 54:22 65:21 moved 48:14 57:20 moving 61:7 moynihan 69:7 mystery 51:5</p>
		<p>n</p>	
		<p>name 4:16 7:18 8:9 18:2,4,5,5,17 19:2,4 21:1 23:15,16 26:5 27:4 28:19 30:14,15 32:12 36:3 40:4 41:17 47:24 48:13 52:13 54:7 68:11 69:7 70:1,1 71:19 natchez 1:22 2:7 71:24 nation 37:16 40:18 41:6 nation's 41:3,6 national 38:20 41:2 native 46:13,13,16 51:15 natural 37:1 necessary 20:12 33:6,8 need 3:18 7:20,25 8:23 9:9,16 14:5 15:4 16:21 22:13 25:1 27:16 28:5,8 34:1,3 36:15 43:2 51:23 59:5 65:3 69:23 needed 8:21 9:7 20:3 42:9 43:17 needs 19:7 24:6,15 25:13 26:25 33:10 34:10 35:6 36:18 40:11 42:10 44:25</p>	

[needs - payments]

<p>45:1 50:7 53:5,9,20 61:16 66:6,8 negatively 69:10 neglect 69:8 70:6,7 neglecting 20:4 neighborhood 21:8 22:7 37:17,20 44:5 44:5,6 52:15 60:7 neighborhoods 19:15 49:13 61:20 61:24 neighbors 53:7,18 53:20 54:22 57:23 69:25 neither 71:15 nepa 38:4,21 39:8 never 25:25 50:9 51:6 67:22 new 14:16 22:4 37:8 37:12 40:19 44:13 56:11,12,17 63:17 newcomers 37:19 newly 33:4 36:18 news 24:9 newspapers 24:9 night 22:13 69:4 noise 37:14 non 32:15 60:25 noncommittal 36:20 nonprofit 64:14 65:12,17,25 67:18 nora 41:16 46:1,6 normal 60:12 normally 24:7,11 north 2:5 9:21 22:15 34:1 48:1 51:21 66:9 norwood 26:16 note 43:8 noted 9:15 42:20 notice 31:16 noticed 13:12 notices 20:14 43:14 noticing 46:11 47:2 47:4</p>	<p>november 32:25 45:6 nuisance 37:15 number 6:14 8:18 14:25 34:23 35:9,15 45:17 50:4 65:11 numbered 41:4 numbers 44:1 62:9 numerous 20:14</p> <p style="text-align: center;">o</p> <p>o'clock 68:25 oath 71:6 obligation 38:4 observations 34:18 obtain 35:14 obviously 9:20 16:22 occupants 19:25 35:14,20 occur 14:16,24 15:3 16:1 24:6,25 49:21 occurred 67:8 october 10:4 offer 54:4 offered 19:25 office 33:24 66:24 officials 42:15,19 oh 22:16,22 56:12 56:19,20 okay 21:2,5,16,25 23:9 26:12,19 27:6 27:25 28:8,12,15 34:13 38:9 55:9 56:11,20 57:2,14,16 57:19,20 old 54:12 older 16:4 once 21:3 ones 21:15 25:12 26:9,9 47:12 65:2 online 5:24 17:3,12 17:18 23:2,3 open 35:6</p>	<p>operate 64:14 opinion 47:21 55:11 opportunity 3:12,20 14:20 31:13,19 47:16 54:4,17,19 option 11:23,25 12:1,6,9,14,16 67:2 options 11:21 12:13 14:14,23 oral 7:15 17:22 order 15:21 33:6 53:13 organize 32:16 organizing 18:18 32:14 36:5 42:13 origin 52:19 original 32:22 45:4 45:5 71:12 originally 13:15 orozco 41:8 ought 60:11 outline 67:3 outlined 16:6 36:19 outreach 21:23 22:5 27:19,20 28:7 33:10 42:6,10,15,23 outsourced 24:17 overcrowded 20:21 overnight 65:17 oversaw 13:2 overview 5:20,25 8:7 owned 62:11 63:7 owner 60:10 owners 14:16 ownership 59:9</p> <p style="text-align: center;">p</p> <p>p.m. 2:6,6 3:2 70:25 page 23:6 30:11,16 34:4 53:4,6 67:3 pages 1:24 paid 50:21 painful 37:15</p>	<p>paint 16:3 palace 59:23,23 palais 59:22 60:6 papers 27:22 paracaídas 70:11 parachutes 70:11 paragraph 62:8 parallel 14:19 parcels 12:17 parents 32:16 46:21 park 62:19,20 parking 59:3 part 4:1,17 6:8 12:4 12:21 16:13 19:9 21:22 35:3 36:6 39:9 53:21 54:1 61:13 66:14 67:20 participate 31:9 49:6 particular 44:8 particularly 20:20 29:14 31:23 party 24:18 71:17 pasadena 8:18,18 9:25 10:1 13:19 14:9,9 18:23 19:6,7 19:11,11 20:25,25 21:23 22:24,24 26:23,23 45:17 58:10,12 59:23 60:12 61:2,3,11 65:10 pass 12:23 70:10 passed 9:16 63:5 passive 69:11 pastors 53:23 54:25 patrick 26:5 28:18 30:8,9,15 69:7 pause 56:18 pay 26:9,11 51:12 53:8,16 payers 26:8 paying 50:22 payments 63:9</p>
---	---	--	---

[pdf - properties]

<p>pdf 26:14 27:9 peace 44:6 pennies 61:4 people 3:19 7:2 8:1 13:8 18:11 23:19 24:12,16,17 25:2,19 27:7,23 30:9 35:15 38:1 42:3 43:24 44:1,3,4,18 46:16 48:13,24 49:4,15,17 49:22 50:4,6,10,13 50:16,16,18 51:3,12 51:16 52:9 56:1 61:7,10,21 62:2,4 63:2,17,21 64:6,13 65:21 68:14 69:2 70:8,10 people's 68:18 peoples 68:19 percent 30:21 40:22 40:25 41:4,5 50:2 52:19,19 53:8 perform 20:9 performed 20:12 period 11:24 12:4,7 13:16,20 32:24 33:5 39:12 45:5 68:16 periodically 10:18 permitted 60:4 perpetuity 15:17 perseverance 19:16 person 18:14 39:20 43:16 63:6 67:5,16 69:6 personnel 67:14 persons 10:10 19:23 62:10 pertains 71:11 pew 41:7 phone 45:17 phrase 69:8 physical 37:9 physically 5:23 pictures 57:12</p>	<p>piece 10:25 placards 69:18 place 4:3,14 11:7 15:14 53:10 62:4 63:15,21 71:4 placed 50:14 places 50:6 plan 14:7 36:16 63:16 planned 13:15 planner 13:1 planning 8:10 28:23 69:6 plans 14:9 please 3:8 11:8 16:14 18:2 39:13 44:17 47:5 plenty 7:24 27:15,16 point 11:1 17:8 23:21 42:8,8 points 31:2 58:7,9 poisonous 49:8 policy 38:20 42:24 political 37:10 pollution 19:14 60:17 poor 20:7 22:5 37:20 59:13 61:2 population 30:23 33:11 36:18 37:23 40:9,16,22,25 41:1 41:3 populations 40:18 porsches 70:13 portico 60:2 portintino 66:23 portion 9:24 41:20 pose 16:5 possibility 15:17 39:8 possible 12:12 16:15 67:13 possibly 13:9 postcard 59:15,18 59:22</p>	<p>postmarked 16:16 pot 69:17,24 potential 8:11 10:10 14:15 15:9 16:2 35:13 potentially 14:7 15:23 poured 50:25 poverty 56:3 power 64:1 powerpoint 6:16 practice 51:1 practices 42:16 51:11 precedent 15:6 39:11 predominately 35:5 preferred 13:22 preparation 13:2 prepare 13:12,22 53:13 prepared 31:24 presence 15:20 present 36:15 presentation 4:10 5:8 6:16 7:16 12:22 31:19 preserve 61:20,24 62:4 president 36:4 pressure 59:8 60:19 60:22 pretty 10:22 43:1 previous 16:18 20:19 previously 17:1 36:10 prices 36:25 37:2,25 50:1 primarily 9:22 29:10 primary 43:8,16 principally 42:10 print 48:18,20,21,22 48:24 53:16</p>	<p>prior 71:5 priority 21:15 private 20:23 probably 58:20 60:5 problem 16:23 19:7 23:3 problematic 20:20 problems 34:9 procedure 32:5 39:17 procedures 41:24 65:7,9 proceeding 6:3 proceedings 31:25 71:3,5,7,13 process 6:3,12,19 7:1,4,6 8:22 10:9 11:3,7 12:21 13:4 13:11 17:14 29:16 31:10 33:15 34:10 65:6 69:12 70:3 products 35:18 professor 41:8 profit 32:15 60:25 program 10:24 14:19 22:18 25:22 29:14,16 42:25 49:7 49:10,16 66:18,19 68:21 programs 55:23,23 project 3:14 4:17,22 4:22 6:18,23 7:12 8:16,23,25 9:2,4,5,9 9:10 13:7 17:10 19:19 21:21 22:23 39:1,2,6 projected 34:17 37:22 39:6 projects 33:25 34:7 50:15 51:23 66:10 promises 66:8 promote 51:14 properly 16:6 24:4 properties 8:11,14 8:15,17,21,22,24,24</p>
--	--	--	---

[properties - remains]

<p>9:3,7,25 10:6,21 11:17,25 12:3,7,11 12:15 14:10,12 15:1 15:11,15,16 16:2,4 19:10,12,20,24 20:2 20:4,20 21:18 30:2 31:12 49:14,18 50:19,24 59:10,12 59:14 61:14 62:14 64:18,18,20,20,23 64:24 65:1,5,11,14 65:15,16,19,21 66:2 67:4,13,15,17,22 property 1:14 2:4 4:12 5:19 11:22 12:8,16 15:19,21 20:6,9,16 22:11,23 29:22 34:2 51:4 58:24 59:6,9,15,17 59:24,25 60:3,11,13 62:11 63:7 64:13 70:24 proportion 37:4 proposed 5:20,25 7:14 8:16 63:15 proposing 25:21 68:17 prosecution 51:7 prospective 35:18 protective 15:14 provide 5:20 6:14 7:17 9:8 17:11 20:3 30:25 31:20 43:6 61:18,21 62:1 provided 30:20 31:20 33:19,21 35:21 61:19 public 1:15 2:4 4:13 5:18 6:11 7:16 15:4 16:9 23:13 31:17,21 31:25 32:23,24 37:14 39:12,23 43:17 45:4,5 63:7 63:25 70:24</p>	<p>purchase 14:21 35:14,20 54:4,17 purchasing 49:17 purpose 6:13,14 8:23 13:5 61:16,17 61:19 62:3 purposeful 61:13 push 44:13 pushed 36:25 put 22:12 34:5 39:23 52:25 53:10 63:15 65:10 69:16 69:18 puts 59:8 putting 25:12</p> <p style="text-align: center;">q</p> <p>qualification 42:25 49:12 qualifications 23:25 24:16 49:6 qualified 24:1,3 qualifies 56:17 qualify 50:4 63:21 64:10 quality 38:23,24 quarters 40:24 question 7:3 23:14 24:13 25:1 questions 5:10 69:3 70:22 queue 7:22 quick 13:24 14:3 quicker 22:14 quickly 12:11 68:11 quit 51:6 quite 68:7 quote 47:12</p> <p style="text-align: center;">r</p> <p>r2 60:5 race 37:11 racial 37:4,16 racism 31:2 railroad 58:24 59:4</p>	<p>raise 4:20 5:15 53:14 58:8 66:2 raised 58:11 raises 39:8 68:19 randy 66:22 range 50:2 rapid 68:16 rate 37:9 rates 10:7 19:25 raul 4:23 23:12 46:4 raul's 17:25 ravine 55:12,14,17 58:3 reaching 59:11 read 17:23 18:2 19:3 27:4,9 28:4 36:9 38:9,10 40:6 41:20 42:6 45:19 readily 35:19 reading 30:11 47:11 real 50:1 51:4 55:22 56:22,23,24 60:22 70:8,9,9 really 9:11 10:13 11:5 24:2,7 34:9 44:14 46:18,25 47:9 47:17,18 55:13,14 56:7 69:11 reason 49:2,3 57:2 reasonable 20:13 33:5 43:11,13 received 6:7 16:16 30:4 receiving 63:13 recipe 36:12 recognize 39:5 44:24 recommend 23:6 recommendations 42:21 record 18:4 28:19 71:6,9 recording 70:18 red 47:2</p>	<p>redefine 49:24 64:4 64:5 reduction 37:4 reference 39:13 references 21:14 reflect 14:10 reflection 47:5,5 refreshments 4:5 regard 26:12 regarding 23:18,24 24:20,23 34:17 regards 14:24 15:25 45:16 55:10 regular 50:19 regulation 65:6 regulations 10:4,11 11:1,3,8,10 14:19 22:20 29:14,16,20 39:18,21,23 43:25 49:23,24 64:3,17,23 64:25 65:3 67:24 regulatory 29:21 40:8 related 7:12 16:15 29:15,18,21 30:2 31:10 32:20 34:2 39:6 51:22 relates 40:10 relation 5:11 relative 71:16 released 13:15 48:6 48:7,10 64:19 religious 54:24 relocate 22:13 35:21 54:25 relocated 33:14 54:2 54:13 relocating 54:21 relocation 20:15,19 36:16 48:5,15 52:5 63:5,8,10,13,16,16 relocations 14:1,24 35:12 remains 29:14</p>
---	--	--	---

[remember - schwarzenegger]

<p>remember 40:4 reminding 69:15 remove 9:10 15:20 53:12 rent 26:9 29:12,14 37:1,2,21 42:25 43:2 49:14 50:4 52:14 53:9,11,14 55:2 61:6 68:19 69:18 renters 36:25 renting 49:18 rents 65:21 66:2 repairing 10:16 repairs 20:12 25:5 51:2,3 61:6 repeat 46:19 47:20 repeatedly 42:14 replace 25:2,4 62:20 62:21,24 replaced 24:23 37:5 50:24 replacement 15:1 63:1,14 replated 67:7 replied 6:10 replying 17:14 report 4:12 6:6 13:3 20:2,6,15,18 24:20 29:17 30:2 31:11 48:5,15 50:10 52:5 52:16 63:10,11 reported 1:21 30:5 40:13 reporter 2:8 6:4 18:3,6 70:18 71:2 reports 21:13 24:7,7 24:20 35:11 representatives 42:18 represents 20:24 43:7 request 33:5 45:15 67:2</p>	<p>requested 71:14 requesting 33:21 requests 45:2 required 16:12 requires 19:24 38:21,25 64:16 reroute 19:9 research 27:17 41:7 56:2 reserved 68:25 reside 64:6,11 residence 14:17,21 53:18 54:8,12 residences 20:21 34:23,25 53:8 resident 26:6 38:10 55:9 58:10 residential 14:25 31:5 33:11 62:10 residents 19:14 20:7 20:24,24 29:20,23 30:1,19,24 31:1,4 31:23 32:20 33:7,22 34:25 35:4,7,10 37:20 39:9 40:24 41:13 44:19 53:12 60:24 residing 29:10 resolve 20:10 resource 15:22 resources 14:2 15:10,12,13 39:24 respect 44:18 respectful 8:4 18:12 respective 7:22 14:8 respond 13:21 16:13 responded 6:10 response 45:14 48:16 responsibility 9:14 38:4 rest 46:7 restrooms 4:6,8 result 15:4,7,10 36:22 37:3,10 51:11</p>	<p>62:10 results 49:22 50:12 retain 12:14 15:16 retaining 12:1 return 4:1 revamping 29:13 review 6:2,25 13:16 13:20 20:19 32:3 33:19 67:21 71:13 revise 32:24 right 3:4 4:3,7 6:17 17:9 21:10,24 24:16 26:2,19 28:11 29:5 29:7 56:12,12,14,17 61:22 rights 12:1,4,8,15,16 rigorous 18:12 rise 41:2 risk 16:5 rivera 21:6 23:10,16 23:17 robert 19:4 45:17 roberti 9:17 10:19 18:21,24 19:21,21 22:17 50:3 53:15 56:5,7,9 61:17,19 61:24,25 62:3,5,7 64:2,12 66:1 roberto 39:13 robertof2 45:18 rodriguez 30:10 32:10 34:12,15,15 role 9:10 ron 4:19,19 8:6,9 14:14 17:1 28:22 30:17 33:24 roof 25:2 roofs 24:23 50:24 rooted 46:14 roots 44:2 46:12,22 46:23 55:12,13 57:15,22,22 58:12 roughly 30:21 36:14 37:23 65:20</p>	<p>round 8:2 route 1:14 2:4 8:12 8:13 10:22 29:22 31:11 70:24 rules 22:20 ryan 5:4</p> <hr/> <p style="text-align: center;">s</p> <hr/> <p>safe 19:22 saint 26:24 sake 8:4 salas 18:15,16 21:2 sale 8:11 11:12,22 11:24 12:5 15:4 33:15 53:13 60:18 62:10 65:11,13 67:8 sales 1:14 2:4 4:12 5:19 9:15,18 10:24 14:19 20:17 22:18 25:22 29:16,20,22 30:2 31:12 34:2 49:6,10,16,16,20 50:8 53:10 63:20 66:19 67:3,5,6,8,10 68:1,1,8,10,11,16,21 70:24 sanctuary 4:8 sandoval 47:23 52:11,13,13 sanitary 19:22 santa 58:24 59:3 savings 65:18 saw 57:21 59:17 saying 18:6 44:9,11 51:24 56:19 58:23 61:18 67:12 says 24:2 25:7 26:14 59:22 61:17 62:8,16 68:21 sb 10:5 22:16 school 41:9 53:24 58:12 schwarzenegger 67:1 68:6</p>
--	---	---	--

<p>screen 17:5 18:9 52:24,25</p> <p>searching 22:3</p> <p>seat 3:6,7</p> <p>second 4:15 6:25 41:12 58:19</p> <p>seconds 34:5 49:2</p> <p>secretary 29:2</p> <p>section 7:15 61:16 61:19 63:24 64:15</p> <p>see 5:16 17:5 24:9 34:8 43:1 44:3 46:20,21,24,25 48:13 58:3 60:21 70:8</p> <p>seeing 53:7 58:1</p> <p>seek 35:22 67:2</p> <p>seen 25:5 57:23,23 69:11</p> <p>seep 58:19</p> <p>segment 51:22</p> <p>segmented 51:20</p> <p>segmenting 52:4,5</p> <p>selected 5:24</p> <p>selection 65:5</p> <p>selectively 49:21</p> <p>self 30:5</p> <p>sell 8:22,23 9:6 10:7 11:17,23 12:3,11,13 12:15 14:12 15:13 15:21 20:2 38:1 51:24 59:14 64:18 64:19,21,23,24 65:1 65:2 67:13</p> <p>selling 10:2,14,21 11:6 12:6,8,17</p> <p>sels 67:11,15 68:5</p> <p>senate 9:16 19:5</p> <p>senator 18:21,25 19:1 43:19,19 45:21 45:23,24 62:5</p> <p>send 4:4 7:11 27:23 28:2,5</p> <p>senior 13:1 27:20 54:9</p>	<p>senior's 22:8</p> <p>seniors 28:6,11</p> <p>sensitivity 44:18</p> <p>sent 42:18 48:17 67:12,15</p> <p>separate 10:25 11:3 11:8 14:19 22:15</p> <p>separated 21:14</p> <p>september 13:17 16:17,19 21:12</p> <p>sequences 70:8</p> <p>sereno 8:19 9:23 19:6,11 20:25 26:7 26:15 27:13 29:11 29:19,22,25 30:19 30:21,24 31:4,6,15 32:3,17,19 33:3,11 34:6,8,22,25 35:5,9 36:4,19,23 37:25 38:10 39:9 41:14 42:11,13 43:23 44:25 45:12,16,20 46:22,22 52:17,18 54:8 55:10</p> <p>series 17:9</p> <p>serious 37:10</p> <p>served 19:4 20:13</p> <p>services 15:5</p> <p>sessions 31:14</p> <p>set 10:15 17:9 49:5 50:1 71:4</p> <p>setting 15:6</p> <p>severe 38:15</p> <p>severely 30:19 35:4</p> <p>share 7:25</p> <p>she'll 26:4</p> <p>sheet 3:12</p> <p>sheffield 26:16</p> <p>shift 40:11,20</p> <p>shirt 5:3,5,15</p> <p>shit 56:16</p> <p>shortage 19:22 38:15</p> <p>shorthand 2:8 71:1 71:7</p>	<p>shotty 50:21</p> <p>show 18:9,24</p> <p>showed 48:7</p> <p>shows 48:14,22</p> <p>sic 26:16 59:22 66:23 70:14</p> <p>side 46:14 70:5</p> <p>sierra 21:8</p> <p>signature 71:23</p> <p>signed 3:8,8 10:5 43:18</p> <p>significant 14:7,18 14:23 15:10,24 38:25 39:3,5 62:11</p> <p>significantly 38:23</p> <p>silent 64:25</p> <p>similar 9:6</p> <p>simply 50:22 62:1 63:11</p> <p>single 10:16</p> <p>singles 37:6</p> <p>sister 52:21 53:17 53:23 54:1</p> <p>sit 17:17 47:3</p> <p>site 27:1</p> <p>sitting 46:12 70:5</p> <p>situation 42:2,3</p> <p>six 50:20 57:20 69:1</p> <p>size 37:5 59:21</p> <p>skills 28:12 43:14,16</p> <p>skin 24:19</p> <p>skyrocketing 37:21</p> <p>slanted 61:10</p> <p>slighting 32:4</p> <p>slings 70:14</p> <p>small 15:17 25:4 39:23 60:12</p> <p>smaller 55:15</p> <p>smart 17:11</p> <p>snake 49:8,8</p> <p>socal.rr.com. 45:18</p> <p>social 37:9,18</p> <p>software 48:23,24</p> <p>sold 10:17 14:10 22:16 37:6 67:17,21</p>	<p>solicit 7:7 11:5</p> <p>solis 45:23</p> <p>solutions 36:19</p> <p>somebody 23:6 57:15</p> <p>something's 25:8</p> <p>soon 67:13</p> <p>sorry 30:13 45:19 46:6</p> <p>sort 59:25</p> <p>sources 24:9</p> <p>south 8:18 9:21 10:1 14:9 19:6,11 20:25 21:23 22:23 26:22 28:23 34:1 45:17 58:10,12 59:23 60:12 61:2,3,11 65:10</p> <p>spanish 30:18,20,22 31:23 33:1,4,7,22 41:19 43:10 45:7,10 45:13 51:15,19</p> <p>speak 3:20 5:1 18:21 23:11 31:20 42:3 46:3,9 47:8,8 48:3 55:2 68:14,24</p> <p>speaker 3:17 4:25 7:20 17:24 23:9 46:2</p> <p>speaking 30:18,22 31:23 33:7 55:12 56:9</p> <p>speaks 62:5</p> <p>specific 33:10 64:6</p> <p>specifically 36:17 63:17</p> <p>specified 23:23</p> <p>speed 67:25</p> <p>spending 51:2</p> <p>spiritual 54:24 55:1</p> <p>spoke 17:2</p> <p>spoken 43:10</p> <p>spreadsheet 28:2</p> <p>sr 4:11 29:22 30:2 31:12 51:21 66:9</p>
---	---	---	---

<p>sria 32:20 staff 4:23 68:2,7,16 standardized 29:21 standards 37:13 standing 54:16 69:3 70:4 start 8:5 44:13 started 3:6 4:9 8:13 8:15 starting 41:14 68:4 state 1:14 2:4 10:21 18:4,5 19:5 20:6 23:14 26:5 29:22 30:5,13 31:11 38:12 40:7,18,21,23 41:21 42:1 43:18 44:8 59:7,14 62:11 63:12 64:13 70:24 71:2 state's 41:1 stated 48:19 statement 38:10 states 33:17 35:23 41:6,10 statistic 33:12 statutes 39:8 stay 56:21 61:22 staying 5:8 stays 56:15 stewardness 59:11 sticks 44:1 stipulation 32:25 stirrers 69:17,24 stock 35:10 stockbridge 26:18 stone 60:15 stop 12:22 53:9 street 28:11,24 52:16,17 58:21 60:8 60:16 61:1 streets 9:18 64:15 64:16 strong 54:24 struggle 19:19 32:15 70:9</p>	<p>studies 13:14 23:18 23:20,25 24:1,10 41:10 study 9:20 10:2 34:3 suarez 41:8 submit 16:23 67:1 submitted 66:13,16 67:19 submitting 16:25 23:2 subscribed 71:18 subsequent 7:1 14:16 substandard 42:15 substantial 30:23 substantially 31:22 substantive 31:14 subsurface 12:1,4,8 12:14,16 22:11 sufficient 14:25 suits 58:15 summary 6:20 14:3 superior 65:8 supervisor 45:23 suppose 60:4 supposed 61:5 62:19 62:21 sure 3:7,11 10:11 25:10 26:17,19 surplus 1:14 2:4 4:11 5:19 16:2 19:20,24 20:2,16 29:22 30:2 31:12 34:2 52:6 62:10 67:23 70:24 surveys 29:6,7 sutton 46:2 47:22,24 47:24 51:10 55:21 58:5 61:15,16 68:15 69:15 system 17:16 systematically 53:12</p>	<p>t</p> <p>table 5:22 50:22 52:18 tables 3:25 take 3:9 4:2 6:4 11:16 17:21 21:15 24:8,11 46:19 57:11 60:23 65:24 67:4 70:12 taken 26:21 40:11 46:16 54:10,16 59:5 65:24 71:3 takes 50:20 68:18 talk 8:11 11:2,11 13:3 talked 57:15 65:13 65:22 talking 10:2 55:21 tardes 32:12 targeted 52:23 69:19,24 70:3,4 targeting 69:17 tax 22:23 26:8 62:14 62:16 taxes 26:10,11 taxpayers 25:11 team 4:17 16:12 17:12 technical 5:4 21:13 29:23 30:6 31:7 tell 27:9 62:5 telling 47:16 templeton 22:15 ten 37:5 67:17 tenant 23:17 26:6 34:16 44:22 48:1 54:8,15 55:9 tenants 10:8 14:20 18:18,19 19:17 20:14 24:22 26:13 29:10 30:4,4 32:21 33:19 35:7 36:4,15 36:25 37:7,8 43:7 43:11,13,15,17</p>	<p>47:25 61:11 65:16 66:3,19 69:10 terms 9:1 10:2 15:2 58:13 terrible 27:20,21 28:7 60:17 testifying 71:6 testimony 71:9 thank 5:17 8:8 12:25 16:8 21:1,2 23:8,9 26:1,2,5 28:17 30:8 32:8,9 34:10,12 35:25 36:1 38:7 39:25 41:15 44:20,21 45:24 46:1 47:21,22 52:9,11 54:6,7 55:4,5 58:4,8 61:14,15 68:22,23 69:5,5 70:16,17,21 thankful 69:15 thanks 19:16 theirs 66:15 therese 36:2 38:8 40:1,4,5 thermostat 57:10 thing 21:16 24:21 28:5 44:13 47:2 50:9 58:19 59:7 things 11:4 16:4 24:21 25:14,14 46:11 47:3,7 55:24 57:10,11 think 3:5 4:2 8:17 10:5,19 11:9 27:12 27:20 28:1 38:3 42:1 55:16 56:7,8 59:4 61:8 third 24:18 25:23 37:23 41:13 62:7 thirdly 7:7 thomas 5:2 thought 53:1 threat 51:7 three 7:21,23 8:5 18:9 21:24 30:9</p>
--	---	---	---

[three - vulnerable]

<p>40:24 51:9 53:1 57:16 60:9 61:1 64:6 65:22 threw 61:5 thursday 1:17 2:7 3:1 ties 54:24 tigers 59:24 tigres 59:22 60:6 time 3:9 5:16 6:4 7:21,22,24 8:1,4 10:6,22 18:13 27:15 33:7 34:3,11 40:20 43:24 44:19 51:17 68:25 70:17 71:4 timeframe 16:23 timely 45:14 timer 18:8 times 7:1 24:9 33:24 33:25 59:17,21 today 7:5 8:11,20 11:2,11,19 13:18 18:22 19:6 30:25 40:10 48:17 61:21 62:2 70:4 today's 6:13 told 24:24 61:1 tom 18:15,16 21:3,5 21:7 tomorrow 56:8 tonight 3:16 4:11,13 4:14,18 5:18,18 6:22 16:22 17:17 23:13 25:25 70:17 topics 13:24 torres 5:13 tossing 47:14,15 total 8:18 town 44:9 track 11:8 trade 57:2 trafficked 60:17 train 56:20 training 56:19,20</p>	<p>transcribed 71:8 transcribing 6:5 transcript 71:9,12 71:14 translated 51:18 translating 32:6,7,7 translation 51:14 translations 42:6 transparency 24:6 24:15 25:18 transparent 25:9 35:6 transportation 9:1,5 9:11 19:9 21:9 29:3 35:16 69:6 trash 23:5 traumatic 54:21 travesty 54:5 treatment 31:1 trees 44:2 tremendous 38:11 tried 48:18,21 true 44:15 71:9 truly 54:3 66:17 trust 24:7 try 25:9 48:21 trying 51:12,12 59:10 60:21 61:8 tunnel 12:2 22:13 52:5 turn 25:20 48:4,25 66:12 turnover 37:1 twice 59:20 two 4:13 11:14 12:13 25:3 30:11 33:24 35:9 39:12 45:11 51:21,23 60:8 60:9,19 63:8 66:9 67:3 68:17,22 69:25 type 17:17 typical 48:9</p>	<p>u ucla's 41:9 uct 19:17 29:10,11 29:14 30:5,16 31:1 33:15,21 34:21 35:2 36:19 38:20 39:4 42:13 45:2,16,17,20 uct's 39:13 unable 20:11 29:23 30:5 31:6,8 68:8 unavailable 20:18 unavoidable 63:22 unbelievable 24:24 unclear 39:19 unconscionable 38:17 undersigned 71:1 understand 5:9 6:1 12:19 24:5 25:1 31:24 33:16 40:8 47:12,13 69:23 understanding 51:18 unfold 69:10 uniform 63:5 unincorporated 32:17 united 18:19 29:9 32:21 35:23 36:4 41:6 units 37:8 62:23 unnecessarily 39:19 unnecessary 51:2 unquote 47:12 unrelated 51:13 unusable 59:1 uploading 23:4 uprooting 36:11 58:1 urban 35:24 urge 44:17 urged 59:13 urgent 19:8</p>	<p>use 13:25 28:12 42:4 49:12,16,25 50:7 64:1 useful 3:14 user 23:7 uses 49:5,10,15 50:12</p> <p>v vacant 25:5,15 64:20 value 49:14 valued 60:6 values 44:17,18 valuing 59:5 van 67:11,15 68:5 variation 11:23 12:3 12:6,9,10,10 variations 11:21 12:20 14:14,22 variety 6:15 8:17 9:2,3 various 10:11 24:9 65:5 vehicles 20:23 59:3 velasquez 4:23 vented 28:16 verbal 3:23 6:7 verbally 7:9 verdesoto 41:16 46:5,6 victoria 47:23 52:11 52:13 view 61:10,12 viewed 35:1 37:17 views 23:2 36:11 violate 65:25 66:1 violates 65:6 violating 65:9 violation 39:7 52:8 66:11 vital 41:24,25 42:2 43:1 vulnerable 36:24 38:17</p>
---	--	--	---

[waist - zoning]

w	62:22 67:21	54:12,23 56:15
waist 14:2 16:1	westside 70:14	58:11 62:22,22 63:8
wait 27:2	whereof 71:18	67:4,17 68:3,17,18
waive 5:1	white 3:21 5:5,15	68:22 69:7
wake 29:12	whites 40:15,23	yesterday 22:6 52:2
walk 5:1	wilford 51:5 69:16	young 26:8 37:6
walked 3:13 59:16	69:20	youth 32:14,16
walking 4:24 17:25	williams 18:15,16	youtube 55:13
want 3:5,7,11 4:25	21:3,5,7,7	yvonne 30:10 32:10
7:8,8,11 8:2 26:7	wilson 67:12	34:12,15
34:5 38:2 46:19	window 25:3,4,8,16	z
47:15 48:4,12,15	witness 71:18	zip 64:6
55:25 57:18 58:7	witnesses 71:5	zoning 60:5
66:12 67:13,25 68:9	wondering 13:18	
68:14 70:1,16	word 23:7 59:11	
wanted 4:2 58:9,13	words 36:11 60:13	
66:17	work 19:16 25:10	
wanting 60:22,23	25:11 40:3 41:18	
wants 47:7	50:19 60:14	
water 57:6,10	worked 67:11	
watts 50:6	working 4:18 34:20	
waving 5:3,5	35:17	
way 5:15 11:18	workshops 33:3	
17:16,20 21:10	45:11	
22:14,16 26:18,25	wrap 68:13	
29:5,7 44:10 47:18	write 7:10,10 33:23	
49:7 53:11 56:12,12	46:7	
56:17 58:18 59:9	writing 46:6	
60:3,5	written 6:7 29:9	
ways 13:9	wrong 26:15 57:4	
we've 9:12 12:24	wrote 23:24	
22:12 24:25 26:2	y	
27:12 36:5 46:23	yeah 27:3 28:8	
47:6 57:16 68:25	year 11:24 12:4,7	
wealthy 37:18 49:13	13:12,23 22:18 36:6	
webpage 22:2	50:20 52:3 56:15	
website 33:21 48:18	64:19,22	
48:19 66:14	yearly 25:6 56:13	
websites 28:9	years 8:14 9:13 20:8	
welcome 5:12,17	21:17,19 22:25 24:8	
welfare 38:19	25:3 26:7 27:24	
wellbeing 55:1	28:6,6,6 36:6 41:4	
went 14:14 22:2	44:6,20,23 46:17,24	
23:23 57:17 58:11	50:14 53:18,25 54:9	

T1-1-1

This comment raises concerns about outreach efforts to Mr. David Roberti. Caltrans did not communicate with Mr. Roberti for this DEIR.

T1-1-2

This comment is read on behalf of Mr. David Roberti. All comments received on the Draft EIR, including verbal comments received at the public hearings and written comments (comment cards, letters, emails), and responses to those comments are included in this report and will be made available to the decision-makers and the public prior to any action on the proposed action.

T1-1-3

This comment is read on behalf of Mr. David Roberti. All comments received on the Draft EIR, including verbal comments received at the public hearings and written comments (comment cards, letters, emails), and responses to those comments are included in this report and will be made available to the decision-makers and the public prior to any action on the proposed action.

The Roberti Bill can be found in Appendix B of the DEIR.

T1-1-4

This comment is read on behalf of Mr. David Roberti. All comments received on the Draft EIR, including verbal comments received at the public hearings and written comments (comment cards, letters, emails), and responses to those comments are included in this report and will be made available to the decision-makers and the public prior to any action on the proposed action.

Caltrans remains consistent and constant with its plan to maintain and provide needed affordable housing. The Draft EIR addresses the need to preserve and expand availability of low and moderate income housing supply along the SR 710 corridor in which Caltrans owns property and meet the intended goal of the legislature.

Caltrans began acquiring properties over the past fifty (50) years. Due to the on-going litigation over the completion of the 1964 adopted meridian route, Caltrans has remained the owner. Caltrans adopted a policy of management; repairing and leasing the homes to the public. At the time, Caltrans was not fully staffed to address the management and oversight of these properties, as it was never the intention to keep the properties for the long term. Caltrans had to adopt a policy, secure budget approval and develop a system as a long term asset manager. Over the past four (4) decades, Caltrans has become much more efficient in its management processes and is effectively monitoring property maintenance to insure tenants that current property oversight prevents homes from falling into disrepair and deter blight from taking over their communities.

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184

T1-1-5

This comment is read on behalf of Mr. David Roberti. All comments received on the Draft EIR, including verbal comments received at the public hearings and written comments (comment cards, letters,

emails), and responses to those comments are included in this report and will be made available to the decision-makers and the public prior to any action on the proposed action.

Caltrans is currently implementing the 2012 audit's recommendations to improve management.

T1-1-6

This comment is read on behalf of Mr. David Roberti. All comments received on the Draft EIR, including verbal comments received at the public hearings and written comments (comment cards, letters, emails), and responses to those comments are included in this report and will be made available to the decision-makers and the public prior to any action on the proposed action.

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184

T1-1-7

This comment is read on behalf of Mr. David Roberti. All comments received on the Draft EIR, including verbal comments received at the public hearings and written comments (comment cards, letters, emails), and responses to those comments are included in this report and will be made available to the decision-makers and the public prior to any action on the proposed action.

All technical studies will be readily available upon request. The Draft Relocation Impact Report was posted online and can be found at <http://www.dot.ca.gov/dist07/resources/envdocs/docs/710sales/>.

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

T1-2-1

The SR-710 Surplus Property Sales Draft Environmental Impact Report public circulation ended on September 8, 2015, extended from August 24, 2015. For a total of 60 days.

T1-2-2

Section 1 15126.6(e)(1) of the CEQA Guidelines dictates that an EIR must include a discussion of the “no project” (“no action” for this EIR), alternative and its impact. The discussion of the “no project” alternative allows the public and the decision-makers to assess the effects of approving the project versus the effects of not approving the project.

T1-2-3

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. Caltrans conducted two public hearings on August 6, 2015 in El Sereno and August 10, 2015 in Pasadena. Caltrans did not hold a public hearing in South Pasadena.

T1-2-4

Caltrans maintains a mailing list containing names and addresses of tenants and other stakeholders. Notices of the public hearings were sent to all interested parties whose address is on that mailing list. Notice of the public hearings were also published in the Pasadena Weekly and the Eastern Publication Group.

T1-2-5

Maps of the proposed tunnel for the SR-710 North Study can be found at http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/ under Project Alternative Maps

T1-2-6

As stated in the environmental document, Alternative 2 Variation B Options 1 and 2 consists of selling surplus parcels all at once. The parcels deemed to be surplus will be put on the market simultaneously for sale as soon as practicable rather than spaced over the 5-year period.

T1-2-7

Typically under the State Board of Equalization, once a governmental agency acquires a property, the property is taken off the property tax rolls and no property taxes are paid (subdivision (a) of section 3 of article XIII of the California Constitution). As a governmental agency Caltrans is exempt from paying taxes on properties purchased for the SR-710 connector and subject of the environmental document. These properties have been removed from the property tax rolls as of the date acquired. As a result of these properties no longer being on the tax roll for the past forty (40) years, revenue collected and distributed to the state, county, school districts, cities, and other agencies who receive a portion of the property tax revenue has been reduced and lost by up to \$51,500,000**. Conversely, the potential sale of these homes to new owners will place the properties back on the State Board of Equalization tax roll and Los Angeles county property tax roll as well as increasing revenue to various governmental agencies. The amount of increased property tax revenue to each of the three (3) cities (Los Angeles, South

Pasadena and Pasadena) is completely dependent upon the value of each residential unit at the time of sale. At this time prices for properties have not been determined.

*** (Tierra West Associates (TWA) researched the median home prices in Los Angeles County in 1960 and median home price every ten (10) years through August 2015. TWA's formula utilized the median home prices over a forty (40) year period, 2% growth and a one percent (1%) Proposition 13 limitation to determine the estimated property tax loss over this defined period. Resources for the Los Angeles County median home values were California Association of Realtors, Department of Finance State of California, and County of Los Angeles).*

T1-2-8

Caltrans and Smart Comments resolved the uploading issue later that evening on August 6, 2015.

T1-3-1

Caltrans and consultants completed the Environmental Impact Report (EIR). The names of the preparation team can be found in Chapter 9 of the EIR.

T1-3-2

Please see response to T1-3-1

T1-3-3

In accordance with California case law, if the Department (Caltrans) is presented with a fair argument that a project may have a significant effect on the environment, it shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect. Caltrans is therefore the Lead Agency under CEQA and is in authority for producing the EIR.

T1-3-4

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184

T1-3-5

Please see response to T1-3-4

T1-3-6

Please see response to T1-3-1

T1-4-1

All comments received on the Draft EIR, including verbal comments received at the public hearings and written comments (comment cards, letters, emails), and responses to those comments are included in this report and will be made available to the decision-makers and the public prior to any action on the proposed action.

T1-4-2

To be considered eligible, a property must meet the National Register Criteria for Evaluation. This involves examining the property's age, integrity, and significance. Of the 460 properties, a total of 113 properties are historical resources, as listed in Table 4.8 Historical Resources on the Surplus Properties, there is currently 10 (out of the 113 historical resources) in the City of Los Angeles that are listed in or determined eligible for listing in the National Register.

T1-4-3

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184

T1-4-4

Caltrans will not disclose the names of the current tenants and/or current occupants in the 710 properties.

T1-4-5

Please see response to T1-4-4. The comment period was not extended 90 days. Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015 for a total of 60 days.

T1-4-6

Caltrans maintains a mailing list containing names and addresses of tenants and other stakeholders. Notices of the public hearings were sent to all interested parties whose address is on that mailing list. Notice of the public hearings were also published in the Pasadena Weekly and the Eastern Publication Group.

T1-4-7

Please see response to T1-4-6.

The DEIR is available for viewing and download at <http://www.dot.ca.gov/dist07/resources/envdocs>. A hard copy of the DEIR was also available for review at Caltrans District 7, Division of Environmental Planning (100S. Main Street, Los Angeles, CA 90012) during public circulation. Additionally, the DEIR was available for review at the following locations during public circulation:

- Civic Center Library, 101 S. 1st St., Alhambra, CA 91801
- San Rafael Library, 1240 Nithsdale Rd., Pasadena, CA 91105
- Pasadena Central Library, 285 E. Walnut St., Pasadena, CA 91101
- El Sereno Library, 5526 Huntington Drive S., Los Angeles, CA 90032
- Allendale Library, 1130 S. Marengo Ave., Pasadena, CA 91106
- South Pasadena Library, 1100 Oxley St., S.Pasadena, CA 91030

T1-5-1

Caltrans has complied with all requirements of the APA Rulemaking process, including providing all interested parties with an opportunity to submit oral and written comments. Caltrans makes information equally available to people with limited English proficiency in accordance with Title VI of the Civil Rights Act.

T1-5-2

Caltrans maintains a mailing list containing names and addresses of tenants and other stakeholders. Notices of the public hearings were sent to all interested parties whose address is on that mailing list.

Caltrans has complied with all requirements of the APA Rulemaking process, including providing all interested parties with an opportunity to submit oral and written comments. Caltrans makes information equally available to people with limited English proficiency in accordance with Title VI of the Civil Rights Act.

T1-6-1

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the environmental documents be translated into Spanish.

T1-6-2

Please see response to T1-6-1.

T1-6-3

Public notice has been provided on the proposed action in a manner that meets and exceeds the CEQA requirements for public notice on the availability of an EIR. Adequate public notice was provided under the CEQA requirements.

T1-6-4

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the environmental documents be translated into Spanish. Notices about the public hearings were distributed in Spanish and English. Further, Caltrans provided Spanish translation at both public meetings.

T1-7-1

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the environmental documents be translated into Spanish. Notices about the public hearings were distributed in Spanish and English. Further, Caltrans provided Spanish translation at both public meetings.

T1-7-2

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

T1-7-3

All technical studies will be readily available upon request. The Draft Relocation Impact Report was posted online and can be found at <http://www.dot.ca.gov/dist07/resources/envdocs/docs/710sales/>.

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the documents be translated into Spanish.

T1-7-4

Caltrans considers respectful treatment of all members of the community, including residents, agency representatives, business owners/operators, and all other interested parties, to be critical for ensuring that all voices are heard and that all input, opinions, complaints, ideas, and suggestions are carefully considered in the process. Caltrans recognizes and is sensitive to the fact that the SR-710 Surplus Property Sales may affect residents. Caltrans is committed to a collaborative, respectful process that recognizes the importance of each member of the community and the value of their input.

T1-8-1

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. Furthermore, Caltrans will not disclose the names of the current tenants and/or current occupants in the 710 properties.

T1-8-2

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

Caltrans cannot distinguish each of the potentially 148 households that may be displaced. Furthermore, Caltrans will not disclose the names of the current tenants and/or current occupants in the 710 properties.

T1-9-1

The persons displaced as a result of this proposed action will receive relocation assistance program (RAP) benefits through California Government Code Section 54238.3 (Appendix B). Further, the Environmental Commitment Record, located in Appendix E, list minimization measure R-1, that will be implemented to avoid and minimize the number of people displaced. Also, throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790. Questions can also be directed to your rental agent.

T1-9-2

The displacement of 148 households is a mathematical assumption developed by Caltrans for the Standardized Regulatory Impact Assessment (SRIA). Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. Gentrification is a phenomenon felt by both renters and property owners. Renters experience higher rents as property values rise in the area. Over the past fifty (50) years property values in Los Angeles County have risen by approximately 427% **; between January 1960 and September 2015, respectively, values have risen from \$15,900 to \$475,600**. As property values have risen, rents have also increased during this same period, to help offset increased costs and return to investors. Generally rents have risen by approximately 648%** percent during this same period. During this time, the median income has not increased proportionately to increases in property value or rents; median income increasing by approximately 143%** percent between 1960 and 2015. Therefore while housing costs have risen for both renters and investors since the initial acquisition of the 460 properties, rising values have always been a part of the local economy where by Gentrification has become a byproduct and component of a growing economy. Many minorities have achieved higher education, better paying jobs and moving back to the areas they were raised; including El Sereno, South Pasadena and Pasadena. Increased education, access to better paying jobs, renting and investing in your childhood community has also created a positive Gentrification; creating stability and pride of ownership, making these areas a better place to reside.

***Source: University of California Los Angeles, University of Southern California, Tierra West Advisors, Inc., California Association of Realtors, Housing and Urban Development, Los Angeles Times. Journalist Resource, Cities, Inequality, Municipal, Race, Cities, Real Estate, Gentrification, urban displacement and affordable housing: Overview and research roundup August 15, 2014*

T1-10-1

Caltrans considers respectful treatment of all members of the community, including residents, agency representatives, business owners/operators, and all other interested parties, to be critical for ensuring that all voices are heard and that all input, opinions, complaints, ideas, and suggestions are carefully considered in the process. Caltrans recognizes and is sensitive to the fact that the SR-710 Surplus Property Sales may affect residents. Caltrans is committed to a collaborative, respectful process that recognizes the importance of each member of the community and the value of their input.

T1-10-2

Caltrans respectfully disagrees with the comment that the Draft EIR failed to comply with CEQA.

With regard to significant effects, Section 4.2.2.3 Significance Criteria in Chapter 4 of the environmental document provides more detailed description of the criteria for determining the significance of impacts related to population and housing.

T1-10-3

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

T1-11-1

It is unclear what the commenter is requesting, this comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

T1-12-1

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the environmental documents be translated into Spanish. Notices about the public hearings were distributed in Spanish and English. Further, Caltrans provided Spanish translation at both public meetings.

T1-12-2

Please see response to T1-12-1

T1-12-3

Adequate public notice was provided under the CEQA requirements.

T1-12-4

Caltrans public outreach effort for the Affordable Sales Program included the scheduling of public hearings on April 20 and April 21, 2015. An additional public hearing was then scheduled and held on May 12, 2015. In the interest of reaching all interested parties with information related to this rulemaking process, hearing notices were sent to all tenants and other stakeholders on our mailing list and published in three. Notices of the public hearings were published in three newspapers in two languages, and posted on: <http://www.dot.ca.gov/dist07/business/710sales/>. Caltrans is currently exploring options to engage outside assistance with homebuyer education. Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790.

T1-12-5

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the documents be translated into Spanish.

T1-12-6

Please see response to T1-12-1

T1-12-7

Caltrans considers respectful treatment of all members of the community, including residents, agency representatives, business owners/operators, and all other interested parties, to be critical for ensuring that all voices are heard and that all input, opinions, complaints, ideas, and suggestions are carefully considered in the process. Caltrans recognizes and is sensitive to the fact that the SR-710 Surplus Property Sales may affect residents. Caltrans is committed to a collaborative, respectful process that recognizes the importance of each member of the community and the value of their input.

T1-12-8

Please see response to comment T1-12-7

T1-13-1

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the environmental documents be translated into Spanish.

T1-13-2

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the documents be translated into Spanish.

T1-13-3

CEQA does not require that a public hearing be held as part of the public review period (CEQA Guidelines §15087); however, Caltrans held two public hearings on the proposed action on August 6 and August 10. Caltrans provided Spanish translation at both public meetings.

T1-14-1

Caltrans considers respectful treatment of all members of the community, including residents, agency representatives, business owners/operators, and all other interested parties, to be critical for ensuring that all voices are heard and that all input, opinions, complaints, ideas, and suggestions are carefully considered in the process. Caltrans recognizes and is sensitive to the fact that the SR-710 Surplus Property Sales may affect residents. Caltrans is committed to a collaborative, respectful process that recognizes the importance of each member of the community and the value of their input.

T1-14-2

Please see response to T1-14-1.

T1-15-1

No technical reports are mandated by state or federal law. If impacts to the community are anticipated, they must be identified and discussed within the body of the Environmental Document. DRIR is a technical report. The DRIR conclusions are summarized in the DEIR. Therefore, the DRIR was completed before the DEIR. With regard to the potential 148 households displaced not analyzed in the DEIR, please refer to Section 4.2.2 in Chapter 4 of the environmental document which summarizes the findings of the DRIR and CIA.

T1-15-2

Please see response to T1-15-1.

T1-15-3

Caltrans and Smart Comments resolved the uploading issue and printing issue later that evening on August 6, 2015.

T1-15-4

The proposed regulation complies with current law. Government Code Section 54236(h) dictates that the Department use median income as published by the United States Department of Housing and Urban Development (HUD) as implemented by Health and Safety Code Section 50093. For this reason, no change was made to the proposed regulation.

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

T1-15-5

The proposed regulation complies with current law. Government Code Section 54236(h) dictates that the Department use median income as published by the United States Department of Housing and Urban Development (HUD) as implemented by Health and Safety Code Section 50093. For this reason, no change was made to the proposed regulation.

T1-15-6

Please see response to T1-15-5.

T1-15-7

Please see response to T1-15-5.

T1-15-8

Please see response to T1-15-5.

T1-15-9

Please see response to T1-15-5.

T1-15-10

The SR-710 Surplus Property Sales is not suggesting to build any freeways; it is unclear what the commenter is requesting, this comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

T1-15-11

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184

T1-15-12

Please see response to T1-15-11.

T1-15-13

This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

T1-15-14

CEQA does not require that the environmental documents be translated into Spanish.

T1-15-15

CEQA “forbids the ‘piecemeal’ review of significant environmental impacts of a project.” The “piecemealing test” set forth by the California Supreme Court provides: “[A]n EIR must include an analysis of the environmental effects of future expansion or other action if: (1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects.” Improper piecemealing may occur if the purpose of the project that is being reviewed is the first step toward future development or where the “the reviewed project legally compels or practically presumes completion of another action.” However, “two projects may properly undergo separate environmental review (i.e., no piecemealing) when the projects have different proponents, serve different purposes, or can be implemented independently.”

The SR-710 Surplus Property Sales is not a consequence of the SR-710 North Study. The SR-710 North Study and the SR-710 Surplus Property Sales have different proponents and they serve different purposes. The SR-710 North Study's purpose 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 SR-710 Surplus Property Sales action intends to offer the surplus properties per SB 416; as stated in S.3 Description of Proposed Action in the DEIR, three state owned parcels are within the scope of the SR-710 North Study alternatives. The three parcels for the SR-710 North Study only modestly limit the SR-710 Surplus Property Sales.

T1-16-1

It is unclear what the commenter is requesting, this comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

T1-16-2

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

Caltrans cannot distinguish each of the potentially 148 households that may be displaced. Furthermore, Caltrans will not disclose the names of the current tenants and/or current occupants in the 710 properties.

T1-16-3

Please see response T1-16-2.

With regard to the extension request, public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days. All technical studies will be readily available upon request. The Draft Relocation Impact Report was posted online and can be found at <http://www.dot.ca.gov/dist07/resources/envdocs/docs/710sales/>.

T1-16-4

Per the 2012 audit, it was found that Caltrans passed up roughly \$22 million in rental income for these properties due to the fact that Caltrans failed to charge rents at the market rate for the majority of the properties. Therefore, Caltrans uses fair market rent determinations for all the properties and adjust the tenants' rents to fair market after providing them with proper notice.

T1-16-5

The Roberti Bill can be found in Appendix B of the environmental document.

T1-16-6

Please see response to T1-16-2.

This comment raises concern about qualifying to purchase a surplus property. Caltrans is currently exploring options to engage outside assistance with homebuyer education. Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790.

T1-17-1

Caltrans is currently exploring options to engage outside assistance with homebuyer education. Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790.

T1-17-2

Caltrans considers respectful treatment of all members of the community, including residents, agency representatives, business owners/operators, and all other interested parties, to be critical for ensuring that all voices are heard and that all input, opinions, complaints, ideas, and suggestions are carefully considered in the process. Caltrans recognizes and is sensitive to the fact that the SR-710 Surplus Property Sales may affect residents. Caltrans is committed to a collaborative, respectful process that recognizes the importance of each member of the community and the value of their input.

T1-18-1

Caltrans is currently exploring options to engage outside assistance with homebuyer education. Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790.

T1-18-2

Please see response to T1-18-1.

T1-18-3

This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR; however, the Affordable Sales Program was created in accordance with the Roberti law, which legislates that, where possible, these properties be sold at affordable prices to low and moderate-income tenants. This legislation intends to preserve, upgrade and expand the supply of housing available to persons and families of low or moderate income in order to mitigate negative environmental effects caused by transportation projects.

T1-18-4

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184.

T1-18-5

Please see response to T1-18-4.

T1-18-6

Please see response to T1-18-4.

T1-18-7

Please see response to T1-18-4.

T1-18-8

Caltrans considers respectful treatment of all members of the community, including residents, agency representatives, business owners/operators, and all other interested parties, to be critical for ensuring that all voices are heard and that all input, opinions, complaints, ideas, and suggestions are carefully considered in the process. Caltrans recognizes and is sensitive to the fact that the SR-710 Surplus Property Sales may affect residents. Caltrans is committed to a collaborative, respectful process that recognizes the importance of each member of the community and the value of their input.

T1-19-1

Please refer to Section 4.4 of the environmental document for a discussion of potential impacts as a result of hazardous waste/materials.

T1-19-2

This comment expresses concern about valuing/appraising parcels. Caltrans-approved appraisals will be prepared in accordance with the Uniform Standards of Professional Appraisal Practice. Caltrans intends to have appraisal contracts in place with external licensed appraisers. Appraisers will contact the tenant to schedule a property inspection. Properties will be offered for purchase as soon as possible after completion of Caltrans approved appraisals.

T1-19-3

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184.

T1-19-4

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

T1-19-5

Caltrans considers respectful treatment of all members of the community, including residents, agency representatives, business owners/operators, and all other interested parties, to be critical for ensuring that all voices are heard and that all input, opinions, complaints, ideas, and suggestions are carefully considered in the process. Caltrans recognizes and is sensitive to the fact that the SR-710 Surplus Property Sales may affect residents. Caltrans is committed to a collaborative, respectful process that recognizes the importance of each member of the community and the value of their input.

T1-20-1

This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR; however, the Affordable Sales Program was created in accordance with the Roberti law, which legislates that, where possible, these properties be sold at affordable prices to low and moderate-income tenants. This legislation intends to preserve, upgrade and expand the supply of housing available to persons and families of low or moderate income in order to mitigate negative environmental effects caused by transportation projects. The Roberti law can be found in Appendix B of the environmental document.

T1-20-2

Please see response to T1-20-1.

T1-20-3

Please see response to T1-20-1.

T1-20-4

Please see response to T1-20-1.

T1-20-5

The SR-710 Surplus Property Sales is not suggesting to destroy any existing housing. Please refer to Section 4.2.2 of the environmental document for a discussion of potential impacts as a result of relocations.

T1-20-6

Caltrans respectfully disagrees with the comment that the Draft EIR failed to comply with state law.

Caltrans has made every effort to minimize the displacement of current tenants. Government Code Section 54237 directs that if property is offered to a housing related entity for development as limited equity cooperative housing, the first right of occupancy is to present occupants. If development as limited equity cooperative housing is not feasible, the purchasing agency shall cause the property to be used for low and moderate-income rental or owner-occupied housing with the first right of occupancy to current occupants. Government Code Section 54238.3(b) sets forth the relocation assistance to be offered. Caltrans will provide relocation advisory assistance and a replacement housing payment that can be used to supplement rent or be applied as a down payment on the purchase of replacement housing. Tenants may also be eligible for moving expenses. To increase the number of occupants who may qualify to purchase property under the Affordable Sales Program, Caltrans is working with the California Housing Finance Agency to identify lending options for affordable purchasers.

T1-20-7

Please see response to T1-20-6.

T1-20-8

This comment raises concern about income data. The proposed regulation complies with current law. Government Code Section 54236(h) specifies how median income should be determined. Caltrans based median income on the best available information and upon the recommendations of the California Department of Housing and Community Development (HCD). For this reason, no change was made to the proposed regulation.

This comment requests that the DEIR identify a mitigation measure for relocation impacts. Section 4.2.2.5 of the environmental document includes the minimization measure R-1 that would be implemented to avoid and minimize the number of people displaced.

T1-20-9

Please see response T1-20-6 and T1-20-8.

T1-20-10

Caltrans adopted the Excess Real Property regulation to implement Streets and Highways Code 118 in February 2015.

T1-20-11

The proposed regulations are in full compliance with the provisions of the APA, in that they adhere to the requirements regarding authority, reference, clarity, consistency, necessity, and non-duplication. Specifically, the regulations were drafted to remain within the scope of the statutory authority and to be consistent with and non-duplicative of existing law.

T1-20-12

This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

T1-20-13

This comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

T1-20-14

Please see response T1-20-8 and T1-15-15.

T1-20-15

Caltrans is in receipt to Christopher Sutton's comment he hand delivered at the Public Hearing. Please see comments A-3 and A-16.

T1-20-16

Caltrans has considered all options and input and has proceeded in accordance with all applicable law.

T1-20-17

It is unclear what the commenter is requesting, this comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

T1-20-18

The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Alternative 2 Variation A Options 1 and 2 was analyzed due to the fact that the SRIA applied a five year period needed to sell all the parcels.

T1-21-1

Caltrans considers respectful treatment of all members of the community, including residents, agency representatives, business owners/operators, and all other interested parties, to be critical for ensuring that all voices are heard and that all input, opinions, complaints, ideas, and suggestions are carefully considered in the process. Caltrans recognizes and is sensitive to the fact that the SR-710 Surplus Property Sales may affect residents. Caltrans is committed to a collaborative, respectful process that recognizes the importance of each member of the community and the value of their input.

**TRANSCRIPT NO. 2 FROM THE AUGUST 10, 2015, PUBLIC
HEARING**

Transcript No. 2 from the August 10, 2015, Public Hearing	
T2-1	David Roberti
T2-2	Annette Marchain
T2-3	Marie Ibsen Risigari-Gai
T2-4	Christopher Sutton
T2-5	Dr. Tom Williams
T2-6	Don Jones
T2-7	Raymond
T2-8	Jim Miller
T2-9	Roberto Flores
T2-10	Brenda Blanco
T2-11	Joe Cano
T2-12	Hugo Garcia
T2-13	Theresa Hernandez-Cano
T2-14	Alexi Shatz
T2-15	Liza Almedia
T2-16	Anne Alderson
T2-17	Christopher Sutton
T2-18	Dr. Tom Williams
T2-19	Hugo Garcia

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

SR 710 SURPLUS PROPERTY SALES
PUBLIC MEETING

August 10, 2015
6:16 p.m. - 7:41 p.m.
Meeting Record

REPORTED BY:
JESSICA HONG
CSR No. 13776
Job No. 2111192

PAGES 1 - 50

1 PASADENA, CALIFORNIA

2 MONDAY, AUGUST 10, 2015; 6:16 P.M.

3 -oOo-

4
5 MR. BRITT: All right. Good evening. We're
6 gonna go ahead and get started. So if you could grab a
7 seat, and we'll get the meeting started. You should be
8 here tonight for the SR 710 Surplus Property Sales public
9 hearing. We had one on August 6th and tonight is the
10 second of the series of two meetings that are taking
11 place. A couple of quick housekeeping things. When you
12 walked in, you should have signed in. If you did not
13 sign in, we would ask that you please do that before you
14 leave so we have a record of everyone who attends. We
15 also have handouts that look like this. This is a fact
16 sheet. We have it in both English and Spanish. It has a
17 lot of information about the project as well as some
18 contact information on the back that will be very useful.
19 You also should have picked up a green card that looks
20 like this. This is a speaker's card. If you would like
21 to make a comment tonight, you are going to need to fill
22 this out. Raul, from my staff, is walking down the
23 middle here. He has extras if you forgot to get one.
24 And when you are finished completing, if you would just
25 wave it at him, and he'll walk around and pick those up

Page 2

1 throughout the meeting. You also should have received or
2 picked up a white comment card that looks like this. We
3 do have a box -- a comment card box in the back that you
4 can drop this off before you leave if you'd like to fill
5 it out. It's also set up as a self-mailer that you can
6 return. On the back side just put your return address
7 and a stamp and then mail it back to us following the
8 meeting. We'll give you all the details on that as we go
9 along.

10 So my name is Chester Britt and I'm with
11 Arellano Associates. I'm part of the consultant team of
12 LSA, and we have a few individuals from Caltrans as well
13 here tonight. So let me just quickly introduce my staff.
14 I have Raul Velasquez here in the green. He's the one
15 that I mentioned will be picking up the speaker cards.
16 We have Ron Kosinski with Caltrans here up front, and we
17 have Garrett as well who will be speaking as part of the
18 presentation. In the back we have Cane Thomas and we
19 also have Ryan from LSA and they're manning the board.
20 So throughout the meeting or afterwards, you will be able
21 to go back and look at the boards, ask questions. We
22 also have a number of laptops, if you didn't notice, that
23 are up against the back far wall, and those laptops are
24 there for you to make a comment as well. So tonight
25 we're gonna be speaking about an overview of the proposed

1 action, make sure that you understanding what it is that
2 we're proposing to do and what the environmental document
3 says about it. We'll be talking about the environmental
4 review process which tonight is a part of the formal
5 record and then we'll receive public comments. The
6 purpose of the meeting is primarily to provide
7 information. We wanna make sure that the public is aware
8 of what's going on and has their information that they
9 need to make a good informed comment. We also want to
10 describe what the environmental review process is about
11 and how we've been going through that process and what
12 are the findings and the summary of the findings that
13 we've been able to determine through the evaluation
14 process. We also wanna make sure that we receive input.
15 Today is a public hearing, and we will be receiving, as I
16 mentioned, your public input. This is not a Q&A session,
17 but we will be allowing you to come up to the mic and
18 make your comment. We have a court reporter up here who
19 will be recording the entire meeting for the purposes of
20 documentation. Okay. We also, as I mentioned -- I just
21 mentioned, actually, the formal oral comment period will
22 come after we are finished with the presentation.
23 Members of the public will be able to provide a formal
24 comment. It will be part of the formal record, and we'll
25 make sure that we receive all of those that want to

1 speak. To speak, you do need to fill out a speaker card
2 so we have it on record. You'll be called to the
3 microphone. I'll call three at a time, so you guys can
4 queue up so we're efficient. And we'll give you three
5 minutes, plus or minus. We're not gonna give you the
6 hook exactly at three minutes, but we would ask that you
7 be mindful of your time. There will be a counter that
8 appears on the screen that will count down the three
9 minutes, and we'll get through all of speakers. And
10 we're just asking that you would not try to give your
11 time to someone else. We would like for everyone who
12 wants to speak to speak, but we're gonna give you three
13 minutes to do that. So I'm gonna pass it over to Ron
14 Kosinski; but before I do, I just wanted to make mention
15 that we do have Gerald Phillips and Bobby Johnson with
16 majority fort leader Chris Holden's 41st District office
17 with us tonight. And we also have former senator David
18 Roberti who will be making a comment as well. So Ron?

19 MR. KOSINSKI: Thank you, Chester. Okay. My
20 name is Ron Kosinski. I'm the deputy for environmental
21 planning with Caltrans, and we're here basically today to
22 talk a little bit about the proposal to sell these houses
23 and we'd like to give you an overview. This won't take
24 -- between us, Garret and I, this will take us about 15,
25 20 minutes only. About 50 years ago, long time ago, the

1 Route 710 Project was introduced. Caltrans about that
2 time started buying properties in this corridor and we've
3 gotten to the point now where we bought properties in
4 Pasadena, South Pasadena and El Sereno. The vast
5 majority of these are in El Sereno incidentally, and we
6 currently hold about 460 deeds to properties that were
7 acquired. It's been identified when these properties are
8 no longer necessary for the study, they should be
9 declared excess per the Streets and Highways Code. The
10 purpose of the action basically is to sell the properties
11 that are no longer impacted by the project alternatives
12 and then also to intent to provide affordable housing in
13 the subject area and remove Caltrans from the property
14 management role we have in these properties. In case you
15 haven't heard, Caltrans hasn't always done a great job in
16 maintaining these properties. It's been kind of ebbs and
17 flows. And as a consequence, probably best if we stay
18 with our focus which is transportations projects rather
19 than rental properties. The study area is, as I
20 mentioned, basically Pasadena looking at the area from
21 Pasadena going north on the map and basically that's the
22 specific area. I should mention there were actually a
23 couple of houses in Alhambra that were brought some
24 number of years ago also. So anyway, this is the study
25 area. This is the area where the houses primarily are

1 all located. We got about a hundred and some odd
2 properties in Pasadena, maybe a hundred or so in South
3 Pasadena, and then close to 300 properties in the Los
4 Angeles/El Sereno area. So let's talk a little bit about
5 the regulations and where we are on that process
6 currently. There are -- in October of 2013 Governor
7 Brown signed South Bill 416 and that specifies that the
8 properties that are declared surplus, we offer for sale
9 of affordable prices to tenants and then the affordable
10 housing entity. The remaining properties will be sold at
11 fair market value. This bill also provides funds from
12 the sale of property to be deposited in a rehabilitation
13 account that will be used to make repairs on the single
14 family houses so that low income, moderate income houses
15 people could afford to buy these houses and maintain
16 them. Maintenance is a big issue. Of course, especially
17 with the older houses, they have this corridor. Another
18 element of this is that legislation was -- the foundation
19 of the legislation was the Roberti Bill which was passed
20 back in 1980s, 1990s sometime dealing with how properties
21 that are no longer required should be sold. Another
22 element is the affordable sales program. And I should
23 point out that there are regulations that are also out
24 for circulation, final copies of regulations are out for
25 circulation currently. The intent at this meeting today

1 is not to take comments on regulations. The regulation
2 has its own specific process. My understanding is that
3 they like us have extended the comment period on the
4 regulations to September 8th. So if you're interested in
5 making insightful comments on regulations and how they
6 should be implemented, that's something that goes to a
7 different entity. It doesn't go to me specifically. I
8 actually am not sure who they go to, but I'm sure that if
9 you ask some people knowledgeable about this, they can
10 provide you that information.

11 DR. WILLIAMS: The deadline for the regulations
12 has been extended?

13 MR. KOSINSKI: I was told today verbally so
14 don't take my word for it. I was told today verbally
15 that the secretary of transportation has extended the
16 regulation guidelines to the 8th of September also. They
17 were supposed to be closed on the 24th. I don't know
18 when. We shouldn't be getting into dialogue here. I
19 with you wouldn't interrupt me please. So let's talk
20 about the alternatives. The first action is the no
21 project action. Any time you do a CEQA document, you
22 have a no project action which is let's just keep going
23 the way we're going. Things are wonderful. Caltrans
24 would retain the ownership of these properties and rent
25 them out. There will be no change in the environmental

1 conditions and no sales would take place. This would
2 sort of certainly evaluate the States and Highways Codes
3 once there is an identification of these properties not
4 being needed. So that's one option. Alternative 2 is
5 the sale option. Let's sell these properties. And there
6 are -- there's a Variation A and a Variation B of this
7 and then an Option 1 and an Option 2 of the sales.
8 Variation A is to sell the properties over a five-year
9 period, but retain the subsurface rights for a future
10 tunnel easement retained under Variation A, Option 1.
11 Variation A, Option 2 is the sale of the properties for
12 over a five-year period where all subsurface rights also
13 conveyed with those properties; so that would be total
14 sale of the properties and their subsurface rights.
15 Through Variation B, this would be an immediate sales.
16 Someone mentioned in the Thursday meeting that we have a
17 Variation B which let's just sell the properties right
18 away. Let's just sell them all immediately and move
19 forward. As soon as the environmental documents are
20 approved, as soon as the regulations are adopted, let's
21 start moving forward with the sales. And you've got the
22 option of selling them immediately retaining the
23 subsurface rights and then, B, too selling the properties
24 immediately with the subsurface rights also conveyed to
25 the person who's buying them. So those are the various

1 options that we're looking at. And with these options
2 there are impacts, and Garrett is here today to discuss
3 briefly the environmental impacts of these alternatives.
4 Garrett?

5 MR. DAMRATH: Thank you, Ron. Okay. So what
6 we're doing right now is we're going through the
7 environmental review process. This is an opportunity for
8 Caltrans as an agency to document all the various
9 environmental impacts associated with the action and then
10 to allow the public and its decision makers to make a
11 decision on the alternative that would be used. We
12 evaluate different ways to minimize the impacts of the
13 actions and we, like I said, evaluate the alternatives of
14 those options. So right now the environmental process.
15 As you know, we did a notice of preparation back in June
16 of 2014. We have been preparing the draft EIR since then
17 and now we are at the public hearings. We have two of
18 them, one was last Thursday in El Sereno. And you're
19 here tonight on the 10th in Pasadena. After the public
20 hearing process is closed, we will look at all the
21 comments that we receive and then we will go ahead and
22 prepare the final environmental document. So some of the
23 topics that are evaluated on the draft environmental
24 document are land use, community factors, relocations,
25 growth inducement, cultural resources, hazardous waste,

1 and then a cumulative impact section which looks at the
2 effects of other projects in the area past, present, and
3 foreseeable future projects. So the summary of the draft
4 environmental document findings are such. Under
5 Alternative 1, we have potential significant impacts to
6 the local plan consistency which would occur in Pasadena,
7 South Pasadena general plans. And the Mission Street
8 specific plan were amended by their local agencies to
9 reflect the properties would not be sold. This would
10 also contribute to a cumulative impact. Under
11 Alternative 2 we have a few different types of impacts.
12 Community character could occur due to displacements,
13 subsequent new owners taking residence. The impacts are
14 anticipated to be less than significant as the affordable
15 sales program is being developed to afford tenants every
16 opportunity to purchase those. And right now, we have
17 absolutely no idea how many relocations will occur as a
18 result of the sale. That would happen after the
19 environmental document has been finalized. So in the
20 environmental document right now, we have it listed as a
21 nonsignificant impact. If it gets up to the numbers of
22 about a hundred and something like that, we may consider
23 it a significant impact and we'll try to get that
24 language in the final environmental document. Less than
25 significant impact -- the list is here. Less than

1 significant impacts associated with those relocations.
2 We're hoping that we don't have any relocations at all,
3 that all the current tenants are able to purchase those
4 properties that they're currently living in. We don't
5 anticipate any growth inducing impacts because the sale
6 would not result in any need to expand public services or
7 encourage and facilitate economic development associated
8 with it. There's a low potential for impacts to cultural
9 resources resulting in a significant effect may occur
10 because any potential surplus of these historic
11 properties may fall into further disrepair at the end of
12 it. It's less than significant impacts associated with
13 hazardous waste due the fact that potential surfaces may
14 contain asbestos and led-based paint. Public comments.
15 So I guess I wanna pass this off over to Britt again --
16 or Chester. I'm sorry.

17 MR. BRITT: That's my last name, same person.
18 So how to submit a comment. I mentioned already you
19 should fill out a green speaker card if you'd like to
20 submit a comment. You're also able to fill out the white
21 comment card and leave it in the box before you leave or
22 you can take it home with you, think about it, fill it
23 out later, and mail it into us. We also have those
24 computers in the back that are set up, and they're ready
25 to receive your comments. You can just sit down and

1 simply type them in. There are some people there to help
2 you navigate the software to make sure that you
3 understand it. It's very easy. As Ron mentioned, the
4 public comment period has been extended from August 24th
5 to September 8th. So in order for your comment to be
6 part of the formal record, you will need to have it
7 submitted by September 8th. That makes it from a 45-day
8 comment period to a 60-day comment period. If you wanna
9 mail a letter, the address for Ron Kosinski who spoke
10 earlier is up on your screen. You can see that. And
11 then also if you would like to go online, the same
12 software that's used in those computers in the back is
13 set up on this URL address. So if you would like to go
14 to your home computer and go online, you can leave a
15 comment using that as well. And then finally, obviously
16 tonight, we're gonna take oral comments and the court
17 reporter is here. I should mention also that if you do
18 make a comment in any of the forms that I just
19 recommended, it will be become part of the final
20 environmental document. Caltrans is required by law to
21 include that in the appendix of the final and respond to
22 each and every comment. So that will be part of the
23 process. So with that, let me find -- Ron, help me find
24 where all the speaker cards are. Oh, I set them down
25 right there. Hold on a second.

1 MR. KOSINSKI: While we have a minute, let me
2 just say one more thing because there might be confusion.
3 This is not a public hearing on the regulations. This is
4 a public hearing on the draft environmental document on
5 how to sell these houses. I cannot say for a fact that
6 the comment period on the regulations has been extended.
7 I was told that verbally today. I have nothing other
8 than a verbal remark from an individual, so I would not
9 rely on that information regarding the regulations. So
10 just for your information, I'll make that very clear;
11 that this is not a hearing on the regulations and the
12 regulations themselves may or may not have been -- the
13 time frame may or may not have been extended to September
14 8th. So I would proceed with finding out what that is
15 officially on the regulations website or wherever the
16 heck they are. I'm done.

17 MR. BRITT: Great. Okay. I think we were gonna
18 invite former Senator Roberti to come forward and make
19 his comment first if he's here. I should mention when
20 you come up to make your comment if you could state your
21 name yourself even though I've called your name just for
22 our record.

23 MR. ROBERTI: Thank you very much for giving me
24 the opportunity to speak to you. I'm David Roberti. I'm
25 the author of the Roberti Bill, Roberti Act. Of all the

1 things that I engaged in when I was with the legislature,
2 I didn't know that this one was going to be the most
3 controversial. My fault. Last Thursday at the -- as I
4 prepare for a remark here -- last Thursday at the El
5 Sereno Christian Church, testimony was given on my
6 behalf, but I prefer that this testimony be regarded to
7 fit into the mind. Last week due to my wife's discharge
8 from the hospital where she had surgery, I did not have
9 the opportunity to speak to the presenter of my remarks
10 and he thought I had cleared them. So there was
11 confusion, and I would prefer these remarks now to be
12 mine. For the record, I want to thank Caltrans for
13 moving to bring some resolution for that number of
14 tenants who under the -- who for decades have languished
15 in a bureaucratic legislative neverland wondering if ever
16 the uncertainty of whether they would ever be able to buy
17 their homes would come into fruition. They deserve a
18 resolution of this matter and they deserve it now
19 regardless of any pending matters with any other tenants
20 who have legitimate concerns at least some of those who
21 are settled not only in their own eyes, but in Caltrans
22 eyes as well. However, for the 148 tenant households
23 that the modifications to text a proposed regulations and
24 the draft relocation impact report indicate will not be
25 able to purchase their houses under the Roberti Act

T2-1-1

1 rules, some further revisions to proposed regulations and
2 to the proposed reports and the proposed outcome are in
3 order. I'd like to point out that 150 percent of area
4 median income that is used is contrary to the intent of
5 the Roberti Act. As long as that area is defined as Los
6 Angeles County as a whole, Government Code Section 54835,
7 the preamble to the Roberti Act, calls for the upgrade
8 and preservation of housing. That cannot be done if the
9 people most able to upgrade and preserve are in fact
10 evicted from their homes. Upgrade and preservation
11 expenses are simply higher in the general Pasadena, South
12 Pasadena, and El Sereno areas than they are in Los
13 Angeles County as a whole. In general, a regional area
14 median income is far more appropriate. In addition, the
15 proposed modifications do not clearly take into
16 consideration that some families because of housing and
17 other exigencies that did not exist way back in 1979 when
18 the Roberti Act passed are now blended. Empty nesters
19 are returning home, but they can -- but that return home
20 can give the artificial appearance of economic comfort
21 when the opposite is more likely to be the case.
22 Additionally as well, the revisions do not seem to take
23 into account special expenses such as reduce the -- my
24 eyes are getting bad -- special expenses which reduce net
25 income such as health costs which affect net income and

T2-1-1

T2-1-2

T2-1-3

1 some families having this greater than others, job
2 retraining expenses, and education costs all staggeringly
3 higher than they were way back in 1979 when the act
4 originally passed. For the families who at present who
5 not qualify according to the suggested regulatory
6 revisions, please give them more time in order to address
7 these suggested amendments and give them at least a
8 minimum chance to prepare their case. Think of it.
9 30 years, 40 years have taken place while people have
10 waited for the outcome, the difficulties of bringing in
11 the legislature, the like government, and Caltrans
12 together. And now they're probably going to be allowed
13 one month, two months in order to prepare something that
14 affects their lifetimes and has affected their lifetimes
15 for years. I ask hopefully that more time can be gained
16 for these 148 households at least who would not qualify
17 to buy their homes under the current revisions of the
18 Roberti Act. At the same time, those who have met the
19 qualifications of Caltrans and had met their own
20 qualifications as well, let them start to buy their
21 homes. They shouldn't be held back simply because
22 there's just abuse everywhere else. It could be a
23 win-win situation for everybody, and it's something that
24 I hope Caltrans takes into consideration. So I wanna
25 thank Caltrans for moving forward. It's some light at

T2-1-3

T2-1-4

T2-1-5

1 the end of the tunnel which we've been waiting for for
2 years and years, and to thank you for giving me the
3 chance to address you.

4 MR. BRITT: Thank you. Okay. First speaker I
5 have is Annette Marchain followed by Marie Ibsen
6 Risigari-Gai. And just remember to state your name for
7 the record.

8 MS. MARCHAIN: Hi. My name is Annette Marchain.
9 When I was a little girl -- and I'm dating myself when I
10 say this -- I remember that we had heard this freeway was
11 going to go through and we lived in South Pasadena and I
12 still own that home. And we were going to be, like,
13 blocked from the proposed route and thought, oh well, my
14 mother who was pretty good at making light of things said
15 well, you know, if I make dad his lunch, I could just
16 drive by and I could hand it out the window to him on the
17 freeway. So that's the kind of thing that we were
18 thinking about at the time. Now, I think that it's
19 marvelous that Caltrans is looking at selling these
20 properties, but I do have a few questions in that regard.
21 How is the pricing going to be set? What is the process
22 going to be? Perhaps this is something that is buried
23 and I haven't read that yet, so do take that into
24 consideration; but I really am concerned about that. And
25 what kind of pricing really would be on this? It would

1 be lovely if the existing tenants could buy because they
2 put up with a lot of things over the years. And I do
3 agree with what the previous speaker said in that regard.
4 However, there was also a comment -- not a comment, but
5 just something that I had read about the previous owners
6 being contacted. I'd like to know how that is going to
7 be handled. Most of these folks have probably gone on to
8 other things and really gone on if you know what I mean.
9 So with that, those are my questions and I hope that we
10 can get those answers soon. Thank you.

11 MR. BRITT: Our next speaker is Marie. I'm
12 sorry. I butchered your last name. I'm sure I got it
13 wrong.

14 MS. IBSEN RISIGARI-GAI: Well, it's a
15 complicated last name. I usually go by Ibsen.
16 Risigari-Gai is my married name. Okay. Good evening.
17 My name is Marie Ibsen, spelled I-b-s-e-n Risigari-Gai
18 R-i-s-i-g-a-r-i hypen G-a-i. My address is 534 Orange
19 Grove Avenue in South Pasadena, and I'm a Caltrans
20 tenant. I come before you once again to appeal for a
21 moratorium on the rental increases. I have been advised
22 that to do so is not within the scope of this hearing,
23 but I disagree. The whole process, the rent increases by
24 the audit, the affordable sales, the rent qualification
25 processes, the sale of the homes, the environmental

T2-2-1

T2-2-2

T2-3-1

1 impact report are all closely intertwined and interwoven
2 with the Roberti Bill. The last hearing, United Caltrans
3 tenants came before you and gave you the authority for
4 the Health and Safety Code 50093 that allows flexibility
5 with regards to the income requirements to qualify for
6 both the affordable sales program and the affordable rent
7 program. To charge 10 percent increases to reach some
8 perceived fair market value for homes that were ordered
9 by the audit to be fixed and maintained is akin to a type
10 of thievery. The only thing that has been achieved that
11 I can see so far is to continually raise the rents. The
12 rents should never have been raised from the beginning
13 until all the maintenance and improvements on all the
14 rental properties within the corridor have been completed
15 to bring the properties up to fair market value. That
16 the rental increases are approaching, September 1 will be
17 the fourth 10 percent increase I have experienced, and it
18 now puts it beyond my monthly budget. Hence, I am moving
19 September 1. Peeling paint, cracked cement, dead trees
20 in need of removal are all hazards at my Caltrans
21 residence. When inspected last -- and these were pointed
22 out again -- the response was we do not have a agree
23 trimming contract at this time and a pamphlet in two
24 languages with advice on how to protect my family from
25 dangers of lead came in the mail. This is insanity. How

T2-3-1

T2-3-2

1 can rental increases be justified? I appeal, again, for
2 a moratorium on the rental increases, a road back to 2012
3 rental rates to reflect the lack of maintenance and
4 repair and to allow the flexibility to use the median
5 income of the area for the city rather than the county
6 median income for qualifying tenants for both the
7 affordable sales and affordable rent programs. With
8 regard to the social impact in the proposed environmental
9 impact report, I am one of the 148 affected families that
10 will be relocated, but this one is being relocated early.
11 Thank you.

12 MR. BRITT: Thank you. Next speaker is
13 Christopher Sutton. And again, if you would like to
14 speak, please fill one out and we'll collect those.

15 MR. SUTTON: My name is Christopher Sutton. My
16 address is 586 La Loma Road; Pasadena. I'm an attorney
17 for a different tenant organization, the Caltrans tenants
18 of the 710 corridor which are predominantly in South
19 Pasadena. I will expand on my comments from last
20 Thursday. The reason why the income calculation must be
21 limited to this corridor is because, for example, the
22 notice of this hearing says that this program is only
23 applicable to this corridor. And in fact, two provisions
24 of the Roberti Law itself which were ignored in the
25 current third draft of the regulations and have been

T2-3-2

T2-4-1

1 ignored in the DEIR state -- let me read them out and
2 quote them to you. In 54238.3 of the Government Code
3 which was amended in 1984. From 1979 to 1984 the Roberti
4 Bill applied to all surplus Caltrans property statewide.
5 And so in some ways it made sense to say affordable area
6 income median area of income is each county. But then
7 starting in January 1st, 1984, the Roberti Bill only
8 applied -- only and has since applied only to properties
9 located within these three cities -- Pasadena, South
10 Pasadena, and the El Sereno part of Los Angeles. So that
11 the area covered by the Roberti Bill on to the 1984
12 amendments is solely that corridor and solely those three
13 zip codes. So the area in which the law applies is the
14 area in which you should calculate the income. In
15 addition, 54238.4 the next section of the Roberti Bill --
16 I'll read the whole thing and then I may come back later
17 if there's time for another comment. This article is
18 intended to benefit the persons and families subject to
19 displacement and persons and families of low or moderate
20 income. Those are two separate categories, people being
21 displaced and people of low and moderate income. This
22 article, the Roberti Bill, shall be liberally construed
23 to prevent such persons or families to enforce the
24 rights, duties, and benefits created by this article.
25 And the draft regulations and the EIR ignore those

T2-4-1

T2-4-2

T2-4-3

1 sections. My final point is there is a deadline on this
2 Friday, August 14th, to comment on the regulations
3 themselves. The regulation process is being handled in a
4 separate process in the Administrative Procedures Act and
5 this process is under the California Environmental
6 Quality Act. The deadline on the regulations themselves
7 should be extended to September 8th as well, and the two
8 processes should merge because you cannot finalize the
9 regulations until the CEQA process is complete. And the
10 decision maker at Caltrans, whoever that is, must wait
11 until the end of the CEQA process to finalize the
12 regulations. So it makes sense that the two processes
13 should be merged, the two administrative records of the
14 two processes shall be merged, and everything that was
15 said in this hearing, in the CEQA hearings, and
16 everything that was said in the prior APA, Administrative
17 Procedure Act, hearings need to be merged together.
18 Otherwise, what you've done is you've separated comments
19 for a purely procedural reason and you've failed to meet
20 the CEQA requirement under 21004 which is to mitigate all
21 known impacts including the displacement of 148 families.
22 And if there's time for a second comment, I'll be back.

23 MR. BRITT: Thank you for your comment. The
24 next speaker is Tom Williams -- Dr. Tom Williams. There
25 you go.

T2-4-3

T2-4-4

1 DR. WILLIAMS: Good evening. Dr. Tom Williams,
2 4117 Barrett Road in El Sereno, 90032-1712; 30-year owner
3 and occupant, resident in El Sereno. I've seen Caltrans
4 operating for 30 years. God help me. Okay. First off,
5 expand the CEQA comment period deadline until, let's say,
6 October the 6th because I don't know if anyone can
7 understand what's going on in the project description.
8 And for the regulations, how can you finalize regulations
9 until the EIR final is certified by who's going to
10 certify the EIR? So you can't really have a regulation
11 enforceable without the CEQA process being completed and
12 that is certification. Okay. Project. What is the
13 project? Is it the actions or is it the regulations that
14 require certain actions to be implemented within these
15 properties and corridor? Okay. I want to see a budget
16 description that says this is an action and this is the
17 regulatory basis for that action. If you don't have that
18 connection, there's something wrong and perhaps Caltrans
19 is manufacturing some additional efforts along with the
20 normal regulations. Oh, some technical things. All
21 technical studies must be linked on the web page. They
22 finally put the DEIR on the same web page, but there are
23 several other technical studies that need to be there.
24 Also, if possible, all the references within the
25 documents should be there. From El Sereno, we have a

T2-5-1

T2-5-2

T2-5-3

T2-5-4

T2-5-5

T2-5-6

1 little bit of a problem. For our census data, they went
2 back to the year 2000 and they didn't even use the census
3 data. They went to the L.A. Times to get the L.A. Times
4 summary for the census characterization of 90032. And by
5 the way, it has changed quite a bit. Okay. Action.

6 What is the action? It should not -- based on 30 years,
7 it should not be the proposed action or no action. Okay.
8 What happens if there's no action? If there's no action,
9 then we have Caltrans forever. God help us. At 10
10 percent every quarter, that's going to be a big hike. So
11 I would highly recommend that it should be the future
12 without the proposed action as being the, quotes, no
13 action alternative.

14 MR. BRITT: Thank you for your comment. So I
15 have one more speaker card. So if anyone would like to
16 speak, now would be the time to turn that in. But my
17 last speaker that I have so far is Don Jones.

18 MR. JONES: I want to thank Senator Roberti on
19 behalf of the Caltrans Tenants Association, United
20 Caltrans Tenants Association, and those who do not belong
21 to any association but understand the implications of the
22 displacement of 150 of your neighbors. We're not talking
23 about the theoretical concepts. We're talking about the
24 real lives of real people. You saw Marie Ibsen here.
25 She has to move out September the 1st. Okay? Because of

T2-5-6

T2-5-7

T2-6-1

1 the rent increases. That's a condition that Caltrans has
2 used to depopulate the corridor. There's a phrase called
3 benign neglect coined by Daniel Patrick Moynahan that
4 shows how bureaucracies treat people like us; not with
5 contempt, but with benign neglect. Immune to the
6 consequences of what happens from their actions, isolated
7 from our reactions behind no return phone calls, messages
8 that are not returned, deadlines that are precise or
9 imprecise or fluid or not fluid, regulations that may or
10 may not apply to you. That is the condition that we find
11 ourselves in here with Caltrans. We need to take a look
12 at the objective conditions that Caltrans has forced on
13 the tenants in this corridor for almost 40 years. 17
14 percent vacancies. Now, 70 percent vacancies of over 460
15 homes? If you were in the private sector, would you
16 allow that amount of vacancies to exist? Deferred
17 maintenance. They put a roof on my home, \$108,000. When
18 we did the discovery in our lawsuit, we found out that
19 there had been a competing bid \$40,000. What was the
20 difference? The difference was fraud, corruption,
21 mismanagement. I don't say that. The California state
22 auditor, Elaine Howle says that. In the 2012 audit it
23 points out mismanagement, nepotism, and even cronyism.
24 If you can imagine that, that people give advantages to
25 their friends and neighbors. Read the audit report. You

T2-6-1

T2-6-2

1 would see that we're not talking about the theoretical
2 manipulation of the community factors that we live in,
3 but the real application that leads to the displacement
4 of so many people. I wanna thank Caltrans for at least
5 giving us a chance to meet to give us a forum to being to
6 organize. I don't wanna them for these regulations. I
7 find them bogus. I find them constrictive and not in the
8 best interest of Senator Roberti. But I wanna leave with
9 a message of hope -- a message of hope that says that we
10 together can change these regulations and change the
11 outcome and solidify the tenants for the long, long haul,
12 not for short term economic interest. Thank you so much.

13 MR. BRITT: The next speaker is Raymond.

14 MR. RAYMOND: Good evening, everyone. My name
15 is Raymond. And thank you Caltrans. Thank you to the
16 public for listening to me briefly. I know there's a lot
17 of emotions here. Living in Los Angeles for 45 years,
18 and I feel the pain here in regards to this. But I was
19 opening up to a gentleman in the back and he was quite
20 worried about being displaced and he was asking me some
21 serious questions and it takes some serious decisions
22 here to place people. And I know a lot of people can't
23 be displaced. They want to stay in the same area as well
24 as the kids and growing up in the same neighborhoods
25 they're used to and from generation. But I have a

T2-6-2

T2-6-3

T2-7 -1

1 solution for this. I'm a private citizen here, but
2 there's a particular 900 acres not far away from about
3 five minutes from subject property. Meeting with certain
4 politicians this week -- and we're gonna work something
5 out for people that need housing that can't afford
6 particular pricing, so to speak -- can't keep up with the
7 economy. And I'm willing to offer those services. It
8 comes with a home and lawn. And depending on if you
9 wanna garden, if you want a yard, I'm sure 900 acres to
10 accommodate these people that are going to be displaced
11 will accommodate them quite nicely. It's very close by
12 off the Glendale 2 Freeway all the way to La Canada.
13 It's 900 acres, folks. So for those people that want
14 inquiry, just see me after and hopefully we can work
15 something out. Thank you.

16 MR. BRITT: Thank you. Okay. Again, the last
17 speaker I have is Jim Miller.

18 MR. MILLER: Good evening. My name is Jim
19 Miller, 844 Fairview Avenue; South Pasadena, California
20 91030. A little over a half a century ago, my mother
21 who's a typical little woman from Pasadena or South
22 Pasadena came to me very upset. She said our house is
23 going to be turned into a off-ramp for the 710 Freeway.
24 Things have changed since then, but still there's a lot
25 of little women in South Pasadena who are worried about



T2-7 -1



T2-8-1

1 their homes, that if you look at the maps for both the
2 tunnel and the houses that were sold, it's very difficult
3 to tell where that tunnel will go, but it's definitely
4 something that the EIR does not address is what will
5 happen from the vibrations of both the digging and tunnel
6 underneath all these houses with the people who still
7 live in them? So my question is what is going to be the
8 root of the tunnel and how can we determine their effect
9 on those properties? You have a lot of old houses.
10 You'll know what's happening with your door stick and you
11 can't get in them. So I'd like to have Caltrans address
12 those questions on the effects of a tunnel. Thank you.

13 MR. BRITT: Thank you. Okay. So we got a new
14 batch. So the first speaker is Roberto Flores followed
15 by Brenda Blanco followed by Joe Cano. For the sake of
16 time, if we could just queue up right here, that would
17 make things a lot easier. Roberto Flores, there you are.

18 MR. FLORES: My name is Roberto Flores. I live
19 at 2028 Berkshire; South Pasadena. I've been a Caltrans
20 tenant for 23 years, more or less. I'm the first up of
21 six, I believe. Together, we make up one statement. The
22 statement is from the United Caltrans Tenants. We want
23 to direct this especially to Mr. Jerry Brown, Kamala
24 Harris, attorney general; Malcolm Dougherty, Caltrans
25 director; Mr. Brian Kelly, acting secretary of California

1 Business Transportation and housing agency; Ms. Carrie
2 Bowen, director of Caltrans District 7; Mr. Brent Green,
3 chief division of right of way and land survey;
4 Ms. Jennifer Lowden, assistant chief, division of right
5 of way and land surveys. Mr. Kosinski, this letter is
6 written on behalf of the United Caltrans Tenants,
7 residing primarily in the community of El Sereno. United
8 Caltrans Tenants was formed on December 6th of 2012 in
9 the wake of Caltrans position of what you've seen as
10 disastrous rent hikes and initiation of the revamping of
11 the Caltrans affordable rent program regulations. UCT,
12 United Caltrans Tenants, remains particularly concerned
13 about some recent developments related to the process
14 involving affordable sales, regulations under the draft
15 environmental impact report following our circumstances
16 related to our concerns. On July 1st, 2015 Caltrans
17 issued El Sereno Caltrans residents affordable sales,
18 regulations, and standardized regulatory impact
19 assessment related to the State Route 710 Surplus
20 Property Sales. El Sereno residents were unable to
21 comprehend the legal and technical jargon, not only in
22 the documents but in the titles. On July 7th, 2015
23 Caltrans issued El Sereno Caltrans residents the Caltrans
24 draft environmental impact report, the DEIR, a CD related
25 to the State Route 710 Surplus Property Sales. In

T2-9-1

T2-9-2

T2-9-3

1 addition to documented evidence not all Caltrans tenants
2 received the DEIR CD. All tenants, without exception,
3 have self-reported to UCT state that they were unable to
4 comprehend the legal and technical jargon contained in
5 the DEIR. Furthermore, only English Spanish speaking in
6 El Sereno are even more severely impacted as they were
7 not provided with a Spanish language DEIR CD. Roughly 50
8 percent of the households in El Sereno contain not only
9 the Spanish speaking heads of households. In essence,
10 the substantial immigrant population of the Caltrans
11 residents in El Sereno is being ignored and denied
12 information that has been provided to other Caltrans
13 residents. UCT believes that this differential treatment
14 points to institutional racism and amounts to the defect
15 and discrimination directed towards Latino Caltrans
16 residents from El Sereno.

17 MR. BRITT: Thank you. Brenda Blanco followed
18 by Joe Cano followed by Hugo Garcia.

19 MS. BLANCO: Hi. My name is Brenda Blanco. I
20 am one of those tenants that could be affected. I've
21 lived in El Sereno for over 16 years. I represent United
22 Caltrans Tenants today. Okay. Because of Caltrans
23 residential community in El Sereno, El Sereno is unable
24 to assimilate and comprehend the legal and technical in
25 English only contained in the aforementioned documents.

T2-9-3

T2-9-4

T2-10-1

1 The community is unable to effectively or meaningfully
2 comment and participate in the community engagement
3 process related to the Caltrans draft environmental
4 impact referred to as DEIR State Route 710 Surplus
5 Property Sales. Caltrans has not taken the opportunity
6 to conduct substantive draft information sessions in the
7 community of El Sereno to educate the community on the
8 draft. In the July 7th, 2015 notice to the community
9 announcing August 6, 2015 and August 10, 2015 public
10 hearings, Caltrans concedes the following. The meeting
11 will include a brief presentation and then an opportunity
12 will be provided for individuals to speak and provide
13 formal comments. So it is clear that these public
14 hearings will not educate the community on the drafts.
15 Most particularly, the monolingual Spanish speaking
16 residents, as Mr. Flores mentioned earlier, would be
17 ill-prepared to understand the proceedings and/or make a
18 comment because Caltrans has failed to inform them in
19 their language appropriately. Caltrans has made
20 available a draft hard copy for review at El Sereno
21 Library in English only. Caltrans has made a frail and
22 slightly attempt to comply with the Administrative
23 Procedure Act by only translating the cover letters.
24 Where is the logic in translating a cover letter and not
25 translating the main document? Because of the lack of

T2-10-2

T2-10-3

T2-10-4

T2-10-5

1 clarity by El Sereno Caltrans tenants related to the
2 draft, ASPSRIA documents, the United Caltrans Tenants are
3 asking for Caltrans to add the additional three months to
4 the original deadline of August 24th, 2015 for public
5 comments. This would revise and extend the public
6 comment period deadline to November 24, 2015 with a
7 stipulation that the Caltrans issue a Spanish language CD
8 no later than August 31st to all Caltrans households and
9 hold additional draft workshops in the El Sereno
10 community, one in English and one in Spanish within the
11 newly established comment period. We believe that this
12 request is reasonable, justified, and necessary in order
13 to allow monolingual Spanish speaking residents time to
14 somehow assimilate these complex documents. Bear in mind
15 this is necessary because Caltrans has failed again to
16 contact -- conduct effective outreach to the -- and
17 address the specific linguistic needs of this
18 well-defined Latino residential area in El Sereno.

19 MR. BRITT: Thank you. Joe Cano followed by
20 Hugo Garcia and Theresa Hernandez.

21 MR. CANO: Joe Cano, 2946 Warwick Avenue; Los
22 Angeles 9 double 032. One statistic contained in the
23 draft EIR that is most confusing and alarming is that
24 Caltrans calculates that 148 Caltrans households will be
25 displaced and relocated during the home sale process.

T2-10-5

T2-10-6

T2-11-1

1 UCT members do not understand this. How is this massive
2 displacement eviction justified? Caltrans states that
3 this estimate is based on the 2015 DEIR that has only
4 been recently made available. This is not a fair amount
5 of time to absorb this. UCT is requesting that the 2015
6 DEIR be provided to all Caltrans residents in English and
7 Spanish. As we write this, we have to date contacted
8 Caltrans deputy district, Ron Kosinski's office two times
9 and both times have been misdirected to other projects,
10 the I-710 South draft EIR and the I -710 North draft EIR.
11 We need additional time to study it. And yet another
12 document in addition to the 400 page draft EIR --
13 regarding the projected 148 household displacements, we
14 have following observations. There will be
15 disproportioned impact on the working class community of
16 El Sereno due to financial circumstance. The UCT
17 believes that if Caltrans calculation of 148 households
18 is accurate, it is likely that El Sereno residents will
19 bear a disproportionate number of those displacements due
20 to the average financial circumstances of El Sereno
21 residents when compared to other residents, affected
22 cities on the I-710 corridor. When you open this
23 context, UCT believes that this is but another instance
24 of blatant discrimination on the part of Caltrans
25 severely affecting Caltrans residents from the

T2-11-2

T2-11-3

T2-11-4

T2-11-5

1 predominant Latino community of El Sereno. Furthermore,
2 Caltrans needs to be open and transparent with residents
3 and disclose who are those affected tenants and how did
4 Caltrans arrive at this calculation. Where will
5 displaced El Sereno Caltrans residents go to find
6 comparable housing stock? The DEIR reports that the
7 following, under community impacts, relocations, no
8 impact. There are 148 households anticipated to be
9 displaced to increase the potential for occupants to
10 obtain financing to purchase and thereby avoid and
11 minimize the number of people displaced. The California
12 Department of Transportation, Caltrans, is working with
13 the California Housing Finance Agency to make financing
14 products available to prospective buyers that are
15 currently readily available in the general lending
16 market. Occupants who do not purchase will be provided
17 by persistence to find and relocate to comparable housing
18 and Caltrans will seek assistance from vacancies such as
19 United States Housing and Urban Development hunt to find
20 affordable housing. Thank you.

21 MR. BRITT: Thank you. Hugo Garcia followed by
22 Theresa Hernandez.

23 MR. GARCIA: My name is Hugo Garcia. I'm from
24 El Sereno. I'm from the United Caltrans Tenants and the
25 El Sereno organizing committee. So I'm gonna follow with

T2-11-5

T2-11-6

1 what Joe was just saying. So Caltrans in their own words
2 views uprooting 148 households as no impact. Caltrans
3 recipe for effective mitigation of the newly homeless
4 crisis is ludicrous. If Caltrans is going to displace
5 roughly one-third of their tenants, they need to present
6 a coherent and well-defined relocation plan that
7 articulates and details specifically how Caltrans is
8 going to address the housing needs of the newly created
9 homeless population from El Sereno. UCT asserts that all
10 of the solutions outlined by Caltrans are intangible,
11 noncommittal, and will not avoid, minimize, or avert
12 homelessness. The displacement of 148 households will
13 result in classic gentrification in the community of El
14 Sereno. No one is more vulnerable to the effects of
15 gentrification than renters. When prices go up, tenants
16 are pushed out whether through natural turnover, rent
17 hikes, or evictions. Large increases in rents and home
18 prices and increases in the number of evictions will
19 result in a decline in the proportion of racial
20 minorities and a reduction in the household size as low
21 income families are often replaced by young singles and
22 couples. When buildings are sold, buyers often evict the
23 existing tenants to move in themselves, combine several
24 units, or bring in new tenants at a higher rate. The
25 social, economic, and physical impacts of gentrification

T2-12-1

T2-12-2

T2-12-3

1 often result in serious political conflict exacerbated by
2 differences in race, class, culture, and community
3 character. New ideas begin to emerge about what is
4 desirable and attractive including standards for
5 architecture, landscaping, public behavior, noise, and
6 nuisance. Gentrification has been the cause of painful
7 conflict throughout the nation often along racial and
8 economic lines. Neighborhood change is often viewed as a
9 miscarriage of social justice often in which middle class
10 newcomers are congratulated for improving a neighborhood
11 who's poor. Minority residents are displaced by
12 skyrocketing rents and economic change. This is a
13 tremendous loss of affordable housing for the state of
14 California and the city of Los Angeles. It's
15 well-documented that throughout the city of L.A we are
16 now and have been experiencing a severe shortage of
17 affordable housing. To contribute to this affordable
18 housing crisis affecting the most vulnerable members of
19 our community is unconscionable and illustrates Caltrans
20 callous discard for the health, education, and welfare of
21 communities. UCT asserts that the National Environmental
22 Policy Act, NEPA, established in 1969, requires federal
23 agencies to analyze the environmental impact of actions
24 that significantly affect the quality of the human
25 environment. And the California Environmental Quality

T2-12-3

T2-12-4

1 Act, CEQA, requires agencies to identify the significant
2 effect on the environment of a project, to identify
3 alternatives to the project, and to indicate the manner
4 in which those significant affects can be mitigated or
5 avoided. UCT is making it clear to Caltrans that their
6 failure to recognize and mitigate these significant
7 effects of this project, especially those remaining to
8 the projected 148 household displacements, is a clear
9 violation of NEPA and CEQA statutes and raises a
10 possibility of legal action on the part of El Sereno
11 residents. Thank you.

12 MR. BRITT: Theresa Hernandez followed by Alexi
13 Shatz and Lisa Almeida.

14 MS. HERNANDEZ-CANO: My name is Theresa
15 Hernandez-Cano. I'm a resident of El Sereno. And a
16 little history. My parents were neighbors unfortunately
17 who fell in love at Chavez Ravine, meaning my
18 grandparents both got \$7,000 for their home, not even
19 free Dodgers tickets as if we would go. And my father
20 fought in World War II and bought that house on the GI
21 Bill. My mother was a riveter. To think that this
22 project is going to continue, I know my parents looking
23 down from heaven would definitely say not on my dime and
24 not on my daughter's time. But to continue with Hugo's
25 statement. To grant an extension for these important

T2-12-4

T2-13-1

1 matters is not without precedent. In the past, Caltrans
2 granted up to two extensions in the same public comment
3 period. Please reference UCT's letter from Hugo Garcia
4 and Roberto Flores dated March 31st, 2015 to Brent Green
5 and Jennifer Lowden. As we did then, we again cite the
6 following -- Administrative Procedure Act of 1946 was
7 established with the following situated reasons: The
8 language of many regulations is frequently unclear and
9 unnecessarily complex. It is often confusing to the
10 person who must comply with the regulations. The
11 complexity and lack of clarity and many regulations puts
12 small businesses -- basically the public -- which do not
13 have the resources to hire experts to assist them at a
14 distinct disadvantage. Ironically, this 1946 issue
15 regarding state acknowledgement of complex understanding
16 regulatory language is directed to the English language
17 population. Fast forward to today especially as it
18 relates to the shift in demographics. The following must
19 be taken into consideration. The 2014 census bureau
20 reported about 14.99 million Latinos live in California
21 edging out the 14.92 million Whites in the state. The
22 country's Latino population is now 55.4 million.
23 California and Los Angeles County have the largest Latino
24 populations of any state or county in the nation
25 according the new figures. The demographic shift has

T2-13-1

1 been a long time coming. According to state figures in
2 1970, the 2.4 million Latinos in California accounted for
3 12 percent of the population while a 15.5 million Whites
4 in the state made up more than three-quarters of
5 residents. By 1990 the Latino population jumped to
6 7.7 million or about 25 percent of the state's
7 population. California is a harbinger of the national
8 rise in Latinos. The nation's Latino population has
9 grown 57 percent since 2000 when Latinos numbered 35.3
10 million. Latinos accounted for most of the nation's
11 growth, 56 percent from 2000 to 2010 according to the Pew
12 Research Bureau. The continued influx and growth of
13 Latinos in the United States is not being fueled
14 exclusively by immigration, but by second and third
15 generation immigrants becoming residents and starting
16 family. This quote is from Marcelo Suarez Orozco,
17 professor and dean of education at UCLA graduate school of
18 education and information studies. So what is the point
19 of all this data? Bottom line, Caltrans needs to deal
20 with and address all outreach and linguistic needs of the
21 principally Latino community of El Sereno in a fair and
22 appropriate manner. Thank you.

23 MR. BRITT: Thank you. Alexi Shatz followed by
24 Lisa.

25 MR. SHATZ: My name is Alexi Shatz, Caltrans

T2-13-2

1 Tenants South Pasadena. UCT, as well as the El Sereno
2 organizing community, ESOC, have repeatedly complained to
3 Caltrans and local elected officials about the continuing
4 substandard outreach practices by Caltrans and their
5 consultants. Yet it continues. In fact, it was
6 addressed in a letter dated March 1st, 2013 when our
7 local elected representatives sent to Caltrans officials,
8 Malcolm Dougherty, Brian Kelly, and Michael Miles. This
9 letter noted the following: Beyond citing
10 recommendations made by the CSA, Caltrans has failed to,
11 number one, conduct outreach meetings in the effected
12 communities to explain the change in policy or the
13 qualification criteria for the affordable rent program.
14 Number two, provide information in any language other
15 than English which represents challenge for those tenants
16 whose primary language is not English. Three, make
17 reasonable accommodations for all tenants who have
18 limited English skills including having all notices and
19 information disseminated to tenants available in their
20 primary language and a person with bilingual skills
21 available at all public meetings with tenants as needed.
22 The following state legislatures signed this letter --
23 Senator Ed Hernandez, Assembly Member Jimmy Gomez,
24 Senator Carol Liu, Assembly Member Chris Holden. To this
25 day, Caltrans continues to not recognize or act on the

T2-14-1

T2-14-2

T2-14-3

T2-14-4

T2-14-5

1 linguistic needs of the El Sereno community. That needs
2 to change. In conclusion, UCT requests the following:
3 That Caltrans add an additional three months to the
4 original public comment deadline of August 24th, 2015.
5 This would extend the original public comment period to
6 November 25th -- 24th, 2015. Thank you.

7 MR. BRITT: Thank you. Lisa, I have another
8 card that says Lisa Almeida. Is it the same one? Okay.

9 MS. ALMEIDA: I lost my voice.

10 MR. BRITT: No problem.

11 MS. ALMEIDA: So I brought some help in case it
12 goes out. Okay? My name is Lisa Almeida, Caltrans
13 tenant for 30 years in El Sereno. Mom, 38 years which I
14 feel she owns the house by now and many other tenants do
15 too. On housing issues of our tenants, you need to
16 remove the wording fair market value. That needs to be
17 removed out of your vocabulary. Houses, to my
18 understanding, are to be sold as is from the amendment of
19 Carol Liu. We Caltrans tenants feel have not kept up
20 maintenance on homes. Many live with mold, and that's
21 done how they tell the people, they bleach it, they paint
22 it, and they say it's fixed. Okay. Next, on the issue
23 of the 148 houses that have families being displaced.
24 Who -- how did Caltranses come to this conclusion and why
25 is it not -- it being disclosed to whom and where. I

T2-14-5

T2-15-1

T2-15-2

T2-15-3

1 feel they have a right to know. Therefore, we need
2 90-day period longer -- we need it to extend to 90 days
3 to study this more, the regulations. And last, on the
4 issues -- wait a minute. I read that already. And last,
5 our outreach is terrible. As a senior -- advocate for
6 the seniors, you cannot assume all seniors have computers
7 or the skills to use and comprehend your way of wording
8 the things. I mean, I, myself, I'm a senior. I have to
9 put the dictionary next to me sometimes when I'm reading
10 these things. So, I mean, that has to change. You have
11 to disclose things to us. You have to explain things
12 better as the last man said and remove that fair market
13 value out of your vocabulary. Thank you.

14 MR. BRITT: Thank you. Anne Alderson?
15 And while Ann's making her way up, she is the last person
16 who has not already spoken. We have one other speaker
17 who wanted to speak again. If you wanna speak, now would
18 be the time to fill it out.

19 MS. ALDERSON: Good evening, ladies and
20 gentlemen. I just want to let everyone know that I am
21 first generation American. I speak a foreign language
22 also. Nobody speaks my language. I understand how the
23 Spanish community feel; but however, there are other
24 people that are also disadvantaged like myself. I'm
25 disabled. I live in Pasadena. I've lived there for over

T2-15-3

T2-15-4

T2-16-1

1 30 years in a Caltrans home, and it is about time that I
2 have the opportunity to by that home. I have gone
3 through so much because of maintenance with Caltrans so
4 it's just been horrific. However, all these new letters
5 about you can't do EIR, you can't do this, this is
6 Caltrans, this is so and so -- and you're just confusing
7 every single person on earth. I swear to God I'm a very
8 intelligent person. I'm able to read. I'm able to
9 understand pretty well, but I don't have a PhD in
10 whatever it is that you stand for. I'm so sorry. Thank
11 you.

12 MR. BRITT: Thank you. Christopher Sutton.

13 MR. SUTTON: When I came in this evening, the
14 consultants from Arellano & Associates said I would be
15 able to speak a second time. And then when I turned in
16 my card for the second speak, I was told I couldn't speak
17 a second time. So I then submitted my card directly to
18 Garrett Damrath who is the person who's receiving all
19 comments on the EIR. He then sent my card to Ron
20 Kosinski over here of Caltrans and then they changed
21 their mind. So then Caltrans was trying to revert to the
22 process they've had for the last year and a half of
23 allowing a hearing to be held and have an hour or two
24 hours of dead time once everybody has spoken even though
25 people want to speak again. My comment on the DEIR is

T2-16-1

T2-16-2

T2-17-1

T2-17-2

1 that a mitigation measure must be proposed that adjusts
2 the medium, moderate, and low income categories. This is
3 the 2015 income category list for Los Angeles County
4 adopted by the HCD. HCD adjusted the low income category
5 for L.A. County which is usually 80 percent of media, but
6 HCD under the law they are allowed to do under the
7 federal regulations, they adopted a low income category
8 from households from one to eight people that exceeds the
9 median category. And they did this because of the high
10 housing costs in Los Angeles County; that they adjusted
11 the low income. And Caltrans, likewise, for purposes of
12 the Roberti Bill, could adjust the low income category,
13 adjust the moderate income category, adjust the median
14 income category for purposes of the Roberti Bill to
15 reflect the incomes in these three zip codes. And I want
16 to turn in this copy of the excerpt from the HCD housing
17 numbers for 2015. Do I give this to you? I brought with
18 me tonight 11 copies of the draft relocation impact
19 report prepared by Caltrans. As I said last week, the
20 metadata for this report says that it was prepared on
21 April 1st, 2015. But it was not released until July 1st,
22 2015, which then limited its ability to be included in
23 the overall SR 710 Freeway EIR and limited its ability to
24 be included in the comments on the EIR on the affordable
25 sales program. So that the draft relocation impact

T2-17-2

T2-17-3

1 report means that these deadlines both on the regulations
2 and the EIR should be extended. The draft relocation
3 impact report does not say what regulations or rules it
4 was prepared under. And so it needs to be more explicit
5 on how they determine 148 families will be displaced.
6 They need to be more explicit. How many of those are in
7 which of the three cities. I'm not saying reveal the
8 addresses of the people that it calculated, but reveal
9 which cities are gonna have the need to relocate the
10 largest number of families. And that environmental
11 impact, the location of where the displacement is going
12 to occur has not been evaluated in this draft
13 environmental impact report. And as I said last week,
14 and as I said earlier, Caltrans has a duty under CEQA,
15 under 21004 of the Public Resources Code, to mitigate all
16 environmental impacts under the Roberti Bill and under
17 the general laws of Caltrans. Streets and Highways Codes
18 section 118.6 requires Caltrans to have regulations for
19 all aspects of its sales program not just the Roberti
20 Bill in this corridor, not just the affordable program,
21 but for all aspects. The sale of the vacant properties,
22 the sale of the vacant land, the sale of the non-profit
23 select, Sequoia School or Ronald McDonald House, and how
24 they're going to choose which nonprofit they're going to
25 select to either take the properties that are occupied or

T2-17-3

T2-17-4

T2-17-5

T2-17-6

T2-17-7

1 take the other properties. These regulations and
2 environmental impact report fail to analyze the entirety
3 of the sales program. And the EIR needs to be corrected
4 to include all sales, not just the affordable sales.

T2-17-7

5 Thank you.

6 MR. BRITT: Thank you. Dr. Tom Williams.

7 Dr. Williams: Two bites of the apple. Dr. Tom
8 Williams, 4117 Barrett Road; El Sereno 90032-1712. Okay.
9 Four basic elements. As a member of the LA32
10 neighborhood council board, we will be -- or I will be
11 holding workshops on the sales of properties in El Sereno
12 at the El Sereno Library Tuesday, Wednesday, and
13 Thursdays from 3:00 to 5:00 both to collect your comments
14 and try to help you understand this monster that we have.
15 Okay. Another one. If the project provides that if
16 there's any excess money from the sales of property, it
17 will be divvied up amongst the three cities and Alhambra
18 and La Canada Flintridge. Why are they getting any
19 money? They have no skin in the game. Well, that's the
20 way it goes. Welcome to Caltrans. Okay. There's 710
21 North study determines who's going to be impacted and
22 when the property might be for sale. However, it doesn't
23 show a map of the current alternatives and the properties
24 involved. So which one? We don't know because the
25 project description doesn't show us where the

T2-18-1

T2-18-2

1 alternatives are and which properties they're going to
2 affect. Okay. There's one last one. For part of the SR
3 710 North, we have a letter from CV14 L.A. City Council
4 Member Jose Huizar that said, hey guys, remember that
5 there is a city council resolution of Los Angeles City
6 that says, hey, not in our backyard. It says the portals
7 shall be south of L.A. Boulevard. Well, they got a
8 little further north and that there should be no
9 construction beneath the city of L.A. Therefore, how can
10 you have impacts from the tunnel alternative that goes
11 against the resolution unanimous in 2012 by the city of
12 Los Angeles City Council. Hmm, seems strange. Is that
13 an impact? I think so. Thank you.

14 MR. BRITT: Thank you. Hugo Garcia.

15 MR. GARCIA: I'll be very brief. I'm just gonna
16 finish up a comment that was omitted and it's just a
17 conclusion of what UCT is requesting. There's four
18 bullet points. That Caltrans add an additional three
19 months to the original public deadline of 8/24/2015.
20 This would extend it to November 24th, 2015. That
21 Caltrans issue a Spanish language DEIR CD to all Caltrans
22 households so that they don't miss anybody that needs it.
23 That Caltrans issue a copy of the 2015 DEIR to Caltrans
24 households in English and Spanish. That Caltrans hold
25 two additional DEIR workshops in the El Sereno community,

T2-18-2

T2-18-3

T2-19-1

T2-19-2

T2-19-3

1 one in English and one in Spanish. So we would
2 appreciate a timely response to our request, and we thank
3 you on behalf of United Caltrans Tenants and El Sereno
4 Organizing Committee. And there will be CC of this
5 letter to Senator Kevin DeLeon, Assembly Member Jimmy
6 Gomez, L.A. City Council Member Jose Huizar, L.A. County
7 Supervisor Hilda Solis, Senator Ed Hernandez, Senator
8 Carol Liu, and Assembly Member Chris Holden. Thanks.

9 MR. BRITT: Thank you. So that was the last
10 speaker card that I have. It's about quarter to 8:00, a
11 little bit shy of that. But I do wanna remind you that
12 we will be sticking around by the boards if you have any
13 further questions or would like to review some of that
14 information. And then there's also still those computers
15 open where you can type a comment in. I wanna thank
16 everyone for taking time out of their busy schedule to be
17 here tonight, and you're adjourned.

18 (Time noted: 7:41 p.m.)
19
20
21
22
23
24
25



T2-19-3

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place therein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were administered an oath; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; further, that the foregoing is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a Federal Case, before completion of the proceedings, review of the transcript [] was [] was not requested.

I further certify I am neither financially interested in the action nor a relative or employee of any attorney or any party to this action.

IN WITNESS THEREOF, I have this date subscribed my name.

Dated: 8/24/2015



JESSICA HONG
CSR No. 13776

[& - address]

&	2.4 40:2	50093 20:4	91030 28:20
& 44:14	20 5:25	534 19:18	a
0	2000 25:2 40:9,11	54238.3 22:2	ability 45:22,23
032 33:22	2010 40:11	54238.4 22:15	able 3:20 4:13,23
1	2012 21:2 26:22	54835 16:6	12:3,20 15:16,25
1 1:25 9:7,10 11:5	30:8 48:11	55.4 39:22	16:9 44:8,8,15
20:16,19	2013 7:6 41:6	56 40:11	absolutely 11:17
10 1:10 2:2 20:7,17	2014 10:16 39:19	57 40:9	absorb 34:5
25:9 32:9	2015 1:10 2:2 30:16	586 21:16	abuse 17:22
108,000 26:17	30:22 32:8,9,9 33:4	5:00 47:13	accommodate 28:10
10th 10:19	33:6 34:3,5 39:4	6	28:11
11 45:18	42:4,6 45:3,17,21	6 32:9	accommodations
118.6 46:18	45:22 48:20,23	60 13:8	41:17
12 40:3	2028 29:19	6:16 1:11 2:2	account 7:13 16:23
13776 1:22 50:25	21004 23:20 46:15	6th 2:9 24:6 30:8	accounted 40:2,10
14.92 39:21	2111192 1:23	7	accurate 34:18
14.99 39:20	23 29:20	7 30:2	achieved 20:10
148 15:22 17:16	24 33:6	7,000 38:18	acknowledgement
21:9 23:21 33:24	24th 8:17 13:4 33:4	7.7 40:6	39:15
34:13,17 35:8 36:2	42:4,6 48:20	70 26:14	acquired 6:7
36:12 38:8 42:23	25 40:6	710 1:1 2:8 6:1	acres 28:2,9,13
46:5	25th 42:6	21:18 28:23 30:19	act 14:25 15:25 16:5
14th 23:2	2946 33:21	30:25 32:4 34:10,10	16:7,18 17:3,18
15 5:24	3	34:22 45:23 47:20	23:4,6,17 32:23
15.5 40:3	30 17:9 24:2,4 25:6	48:3	37:22 38:1 39:6
150 16:3 25:22	42:13 44:1	7:41 1:11 49:18	41:25
16 31:21	300 7:3	7th 30:22 32:8	acting 29:25
17 26:13	31st 33:8 39:4	8	action 4:1 6:10 8:20
1946 39:6,14	35.3 40:9	8/24/2015 48:19	8:21,22 10:9 24:16
1969 37:22	38 42:13	50:21	24:17 25:5,6,7,7,8,8
1970 40:2	3:00 47:13	80 45:5	25:12,13 38:10
1979 16:17 17:3	4	844 28:19	50:16,17
22:3	40 17:9 26:13	8:00 49:10	actions 10:13 24:13
1980s 7:20	40,000 26:19	8th 8:4,16 13:5,7	24:14 26:6 37:23
1984 22:3,3,7,11	400 34:12	14:14 23:7	add 33:3 42:3 48:18
1990 40:5	4117 24:2 47:8	9	addition 16:14
1990s 7:20	416 7:7	9 33:22	22:15 31:1 34:12
1st 22:7 25:25 30:16	41st 5:16	90 43:2,2	additional 24:19
41:6 45:21,21	45 13:7 27:17	900 28:2,9,13	33:3,9 34:11 42:3
2	460 6:6 26:14	90032 25:4	48:18,25
2 9:4,7,11 11:11	5	90032-1712 24:2	additionally 16:22
28:12	50 1:25 5:25 31:7	47:8	address 3:6 13:9,13
			17:6 18:3 19:18
			21:16 29:4,11 33:17

<p>36:8 40:20 addressed 41:6 addresses 46:8 adjourned 49:17 adjust 45:12,13,13 adjusted 45:4,10 adjusts 45:1 administered 50:6 administrative 23:4 23:13,16 32:22 39:6 adopted 9:20 45:4,7 advantages 26:24 advice 20:24 advised 19:21 advocate 43:5 affect 16:25 37:24 48:2 afford 7:15 11:15 28:5 affordable 6:12 7:9 7:9,22 11:14 19:24 20:6,6 21:7,7 22:5 30:11,14,17 35:20 37:13,17,17 41:13 45:24 46:20 47:4 aforementioned 31:25 agencies 11:8 37:23 38:1 agency 10:8 30:1 35:13 ago 5:25,25 6:24 28:20 agree 19:3 20:22 ahead 2:6 10:21 akin 20:9 alarming 33:23 alderson 43:14,19 alexi 38:12 40:23,25 alhambra 6:23 47:17 allow 10:10 21:4 26:16 33:13 allowed 17:12 45:6</p>	<p>allowing 4:17 44:23 allows 20:4 almeida 38:13 42:8 42:9,11,12 alternative 9:4 10:11 11:5,11 25:13 48:10 alternatives 6:11 8:20 10:3,13 38:3 47:23 48:1 amended 11:8 22:3 amendment 42:18 amendments 17:7 22:12 american 43:21 amount 26:16 34:4 amounts 31:14 analyze 37:23 47:2 angeles 7:4 16:6,13 22:10 27:17 33:22 37:14 39:23 45:3,10 48:5,12 ann's 43:15 anne 43:14 annette 18:5,8 announcing 32:9 answers 19:10 anticipate 12:5 anticipated 11:14 35:8 anybody 48:22 anyway 6:24 apa 23:16 appeal 19:20 21:1 appearance 16:20 appears 5:8 appendix 13:21 apple 47:7 applicable 21:23 application 27:3 applied 22:4,8,8 applies 22:13 apply 26:10 appreciate 49:2</p>	<p>approaching 20:16 appropriate 16:14 40:22 appropriately 32:19 approved 9:20 april 45:21 architecture 37:5 area 6:13,19,20,22 6:25,25 7:4 11:2 16:3,5,13 21:5 22:5 22:6,11,13,14 27:23 33:18 areas 16:12 arellano 3:11 44:14 arrive 35:4 article 22:17,22,24 articulates 36:7 artificial 16:20 asbestos 12:14 asking 5:10 27:20 33:3 aspects 46:19,21 aspsria 33:2 assembly 41:23,24 49:5,8 asserts 36:9 37:21 assessment 30:19 assimilate 31:24 33:14 assist 39:13 assistance 35:18 assistant 30:4 associated 10:9 12:1 12:7,12 associates 3:11 44:14 association 25:19,20 25:21 assume 43:6 attempt 32:22 attends 2:14 attorney 21:16 29:24 50:17 attractive 37:4</p>	<p>audit 19:24 20:9 26:22,25 auditor 26:22 august 1:10 2:2,9 13:4 23:2 32:9,9 33:4,8 42:4 author 14:25 authority 20:3 available 32:20 34:4 35:14,15 41:19,21 avenue 19:19 28:19 33:21 average 34:20 avert 36:11 avoid 35:10 36:11 avoided 38:5 aware 4:7</p> <p style="text-align: center;">b</p> <p>b 9:6,15,17,23 19:17 back 2:18 3:3,6,7,18 3:21,23 7:20 10:15 12:24 13:12 16:17 17:3,21 21:2 22:16 23:22 25:2 27:19 backyard 48:6 bad 16:24 barrett 24:2 47:8 based 12:14 25:6 34:3 basic 47:9 basically 5:21 6:10 6:20,21 39:12 basis 24:17 batch 29:14 bear 33:14 34:19 becoming 40:15 beginning 20:12 behalf 15:6 25:19 30:6 49:3 behavior 37:5 believe 29:21 33:11 believes 31:13 34:17 34:23</p>
---	---	--	---

[belong - cite]

<p>belong 25:20 beneath 48:9 benefit 22:18 benefits 22:24 benign 26:3,5 berkshire 29:19 best 6:17 27:8 better 43:12 beyond 20:18 41:9 bid 26:19 big 7:16 25:10 bilingual 41:20 bill 7:7,11,19 14:25 20:2 22:4,7,11,15 22:22 38:21 45:12 45:14 46:16,20 bit 5:22 7:4 25:1,5 49:11 bites 47:7 blanco 29:15 31:17 31:19,19 blatant 34:24 bleach 42:21 blended 16:18 blocked 18:13 board 3:19 47:10 boards 3:21 49:12 bobby 5:15 bogus 27:7 bottom 40:19 bought 6:3 38:20 boulevard 48:7 bowen 30:2 box 3:3,3 12:21 brenda 29:15 31:17 31:19 brent 30:2 39:4 brian 29:25 41:8 brief 32:11 48:15 briefly 10:3 27:16 bring 15:13 20:15 36:24 bringing 17:10 britt 2:5 3:10 12:15 12:17 14:17 18:4</p>	<p>19:11 21:12 23:23 25:14 27:13 28:16 29:13 31:17 33:19 35:21 38:12 40:23 42:7,10 43:14 44:12 47:6 48:14 49:9 brought 6:23 42:11 45:17 brown 7:7 29:23 budget 20:18 24:15 buildings 36:22 bullet 48:18 bureau 39:19 40:12 bureaucracies 26:4 bureaucratic 15:15 buried 18:22 business 30:1 businesses 39:12 busy 49:16 butchered 19:12 buy 7:15 15:16 17:17,20 19:1 buyers 35:14 36:22 buying 6:2 9:25</p>	<p>17:11,19,24,25 18:19 19:19 20:2,20 21:17 22:4 23:10 24:3,18 25:9,19,20 26:1,11,12 27:4,15 29:11,19,22,24 30:2 30:6,8,9,11,12,16,17 30:23,23,23 31:1,10 31:12,15,22,22 32:3 32:5,10,18,19,21 33:1,2,3,7,8,15,24 33:24 34:2,6,8,17 34:24,25 35:2,4,5 35:12,18,24 36:2,4 36:7,10 37:19 38:5 39:1 40:19,25 41:3 41:4,7,10,25 42:3 42:12,19 44:1,3,6 44:20,21 45:11,19 46:14,17,18 47:20 48:18,21,21,23,23 48:24 49:3 caltranses 42:24 canada 28:12 47:18 cane 3:18 cano 29:15 31:18 33:19,21,21 38:14 38:15 card 2:19,20 3:2,3 5:1 12:19,21 25:15 42:8 44:16,17,19 49:10 cards 3:15 13:24 carol 41:24 42:19 49:8 carrie 30:1 case 6:14 16:21 17:8 42:11 50:12 categories 22:20 45:2 category 45:3,4,7,9 45:12,13,14 cause 37:6 cc 49:4</p>	<p>cd 30:24 31:2,7 33:7 48:21 cement 20:19 census 25:1,2,4 39:19 century 28:20 ceqa 8:21 23:9,11,15 23:20 24:5,11 38:1 38:9 46:14 certain 24:14 28:3 certainly 9:2 certification 24:12 certified 24:9 50:1 certify 24:10 50:2 50:15 challenge 41:15 chance 17:8 18:3 27:5 change 8:25 27:10 27:10 37:8,12 41:12 42:2 43:10 changed 25:5 28:24 44:20 character 11:12 37:3 characterization 25:4 charge 20:7 chavez 38:17 chester 3:10 5:19 12:16 chief 30:3,4 choose 46:24 chris 5:16 41:24 49:8 christian 15:5 christopher 21:13 21:15 44:12 church 15:5 circulation 7:24,25 circumstance 34:16 circumstances 30:15 34:20 cite 39:5</p>
	c		
	<p>calculate 22:14 calculated 46:8 calculates 33:24 calculation 21:20 34:17 35:4 california 2:1 23:5 26:21 28:19 29:25 35:11,13 37:14,25 39:20,23 40:2,7 50:2 call 5:3 called 5:2 14:21 26:2 callous 37:20 calls 16:7 26:7 caltans 36:1 caltrans 3:12,16 5:21 6:1,13,15 8:23 10:8 13:20 15:12,21</p>		

[cities - daughter's]

<p>cities 22:9 34:22 46:7,9 47:17 citing 41:9 citizen 28:1 city 21:5 37:14,15 48:3,5,5,9,11,12 49:6 clarity 33:1 39:11 class 34:15 37:2,9 classic 36:13 clear 14:10 32:13 38:5,8 cleared 15:10 clearly 16:15 close 7:3 28:11 closed 8:17 10:20 closely 20:1 code 6:9 16:6 20:4 22:2 46:15 codes 9:2 22:13 45:15 46:17 coherent 36:6 coined 26:3 collect 21:14 47:13 combine 36:23 come 4:17,22 14:18 14:20 15:17 19:20 22:16 42:24 comes 28:8 comfort 16:20 coming 40:1 comment 2:21 3:2,3 3:24 4:9,18,21,24 5:18 8:3 12:18,20 12:21 13:4,5,8,8,15 13:18,22 14:6,19,20 19:4,4 22:17 23:2 23:22,23 24:5 25:14 32:2,18 33:6,11 39:2 42:4,5 44:25 48:16 49:15 comments 4:5 8:1,5 10:21 12:14,25 13:16 21:19 23:18 32:13 33:5 44:19</p>	<p>45:24 47:13 committee 35:25 49:4 communities 37:21 41:12 community 10:24 11:12 27:2 30:7 31:23 32:1,2,7,7,8 32:14 33:10 34:15 35:1,7 36:13 37:2 37:19 40:21 41:2 42:1 43:23 48:25 comparable 35:6,17 compared 34:21 competing 26:19 complained 41:2 complete 23:9 completed 20:14 24:11 completing 2:24 completion 50:13 complex 33:14 39:9 39:15 complexity 39:11 complicated 19:15 comply 32:22 39:10 comprehend 30:21 31:4,24 43:7 computer 13:14 computers 12:24 13:12 43:6 49:14 concedes 32:10 concepts 25:23 concerned 18:24 30:12 concerns 15:20 30:16 conclusion 42:2,24 48:17 condition 26:1,10 conditions 9:1 26:12 conduct 32:6 33:16 41:11 conflict 37:1,7</p>	<p>confusing 33:23 39:9 44:6 confusion 14:2 15:11 congratulated 37:10 connection 24:18 consequence 6:17 consequences 26:6 consider 11:22 consideration 16:16 17:24 18:24 39:19 consistency 11:6 constrictive 27:7 construction 48:9 construed 22:22 consultant 3:11 consultants 41:5 44:14 contact 2:18 33:16 contacted 19:6 34:7 contain 12:14 31:8 contained 31:4,25 33:22 contempt 26:5 context 34:23 continually 20:11 continue 38:22,24 continued 40:12 continues 41:5,25 continuing 41:3 contract 20:23 contrary 16:4 contribute 11:10 37:17 controversial 15:3 conveyed 9:13,24 copies 7:24 45:18 copy 32:20 45:16 48:23 corrected 47:3 corridor 6:2 7:17 20:14 21:18,21,23 22:12 24:15 26:2,13 34:22 46:20</p>	<p>corruption 26:20 costs 16:25 17:2 45:10 council 47:10 48:3,5 48:12 49:6 count 5:8 counter 5:7 country's 39:22 county 16:6,13 21:5 22:6 39:23,24 45:3 45:5,10 49:6 couple 2:11 6:23 couples 36:22 course 7:16 court 4:18 13:16 cover 32:23,24 covered 22:11 cracked 20:19 created 22:24 36:8 crisis 36:4 37:18 criteria 41:13 cronyism 26:23 csa 41:10 csr 1:22 50:25 cultural 10:25 12:8 culture 37:2 cumulative 11:1,10 current 12:3 17:17 21:25 47:23 currently 6:6 7:6,25 12:4 35:15 cv14 48:3</p>
			d
			<p>dad 18:15 damrath 10:5 44:18 dangers 20:25 daniel 26:3 data 25:1,3 40:19 date 34:7 50:18 dated 39:4 41:6 50:21 dating 18:9 daughter's 38:24</p>

<p>david 5:17 14:24 day 13:7,8 41:25 43:2 days 43:2 dead 20:19 44:24 deadline 8:11 23:1,6 24:5 33:4,6 42:4 48:19 deadlines 26:8 46:1 deal 40:19 dealing 7:20 dean 40:17 decades 15:14 december 30:8 decision 10:10,11 23:10 decisions 27:21 declared 6:9 7:8 decline 36:19 deeds 6:6 defect 31:14 deferred 26:16 defined 16:5 33:18 36:6 definitely 29:3 38:23 deir 22:1 24:22 30:24 31:2,5,7 32:4 34:3,6 35:6 44:25 48:21,23,25 deleon 49:5 demographic 39:25 demographics 39:18 denied 31:11 department 35:12 depending 28:8 depopulate 26:2 deposited 7:12 deposition 50:12 deputy 5:20 34:8 describe 4:10 description 24:7,16 47:25 deserve 15:17,18</p>	<p>desirable 37:4 details 3:8 36:7 determine 4:13 29:8 46:5 determines 47:21 developed 11:15 development 12:7 35:19 developments 30:13 dialogue 8:18 dictionary 43:9 difference 26:20,20 differences 37:2 different 8:7 10:12 11:11 21:17 differential 31:13 difficult 29:2 difficulties 17:10 digging 29:5 dime 38:23 direct 29:23 directed 31:15 39:16 direction 50:8 directly 44:17 director 29:25 30:2 disabled 43:25 disadvantage 39:14 disadvantaged 43:24 disagree 19:23 disastrous 30:10 discard 37:20 discharge 15:7 disclose 35:3 43:11 disclosed 42:25 discovery 26:18 discrimination 31:15 34:24 discuss 10:2 displace 36:4 displaced 22:21 27:20,23 28:10 33:25 35:5,9,11 37:11 42:23 46:5</p>	<p>displacement 22:19 23:21 25:22 27:3 34:2 36:12 46:11 displacements 11:12 34:13,19 38:8 disproportionate 34:19 disproportioned 34:15 disrepair 12:11 disseminated 41:19 distinct 39:14 district 5:16 30:2 34:8 division 30:3,4 divvied 47:17 document 4:2 8:21 10:8,22,24 11:4,19 11:20,24 13:20 14:4 32:25 34:12 documentation 4:20 documented 31:1 37:15 documents 9:19 24:25 30:22 31:25 33:2,14 dodgers 38:19 doing 10:6 don 25:17 door 29:10 double 33:22 dougherty 29:24 41:8 dr 8:11 23:24 24:1,1 47:6,7,7 draft 10:16,23 11:3 14:4 15:24 21:25 22:25 30:14,24 32:3 32:6,8,20 33:2,9,23 34:10,10,12 45:18 45:25 46:2,12 drafts 32:14 drive 18:16 drop 3:4</p>	<p>due 11:12 12:13 15:7 34:16,19 duties 22:24 duty 46:14</p> <hr/> <p style="text-align: center;">e</p> <hr/> <p>e 19:17 earlier 13:10 32:16 46:14 early 21:10 earth 44:7 easement 9:10 easier 29:17 easy 13:3 ebbs 6:16 economic 12:7 16:20 27:12 36:25 37:8,12 economy 28:7 ed 41:23 49:7 edging 39:21 educate 32:7,14 education 17:2 37:20 40:18 eduction 40:17 effect 12:9 29:8 38:2 effected 41:11 effective 33:16 36:3 effectively 32:1 effects 11:2 29:12 36:14 38:7 efficient 5:4 efforts 24:19 eight 45:8 eir 10:16 22:25 24:9 24:10 29:4 33:23 34:10,10,12 44:5,19 45:23,24 46:2 47:3 either 46:25 el 6:4,5 7:4 10:18 15:4 16:12 22:10 24:2,3,25 30:7,17 30:20,23 31:6,8,11 31:16,21,23,23 32:7 32:20 33:1,9,18</p>
---	---	--	--

<p>34:16,18,20 35:1,5 35:24,25 36:9,13 38:10,15 40:21 41:1 42:1,13 47:8,11,12 48:25 49:3 elaine 26:22 elected 41:3,7 element 7:18,22 elements 47:9 emerge 37:3 emotions 27:17 employee 50:16 empty 16:18 encourage 12:7 enforce 22:23 enforceable 24:11 engaged 15:1 engagement 32:2 english 2:16 31:5,25 32:21 33:10 34:6 39:16 41:15,16,18 48:24 49:1 entire 4:19 entirety 47:2 entity 7:10 8:7 environment 37:25 38:2 environmental 4:2,3 4:10 5:20 8:25 9:19 10:3,7,9,14,22,23 11:4,19,20,24 13:20 14:4 19:25 21:8 23:5 30:15,24 32:3 37:21,23,25 46:10 46:13,16 47:2 esoc 41:2 especially 7:16 29:23 38:7 39:17 essence 31:9 established 33:11 37:22 39:7 estimate 34:3 evaluate 9:2 10:12 10:13</p>	<p>evaluated 10:23 46:12 evaluation 4:13 evening 2:5 19:16 24:1 27:14 28:18 43:19 44:13 everybody 17:23 44:24 evict 36:22 evicted 16:10 eviction 34:2 evictions 36:17,18 evidence 31:1 exacerbated 37:1 exactly 5:6 example 21:21 exceeds 45:8 exception 31:2 excerpt 45:16 excess 6:9 47:16 exclusively 40:14 exigencies 16:17 exist 16:17 26:16 existing 19:1 36:23 expand 12:6 21:19 24:5 expenses 16:11,23 16:24 17:2 experienced 20:17 experiencing 37:16 experts 39:13 explain 41:12 43:11 explicit 46:4,6 extend 33:5 42:5 43:2 48:20 extended 8:3,12,15 13:4 14:6,13 23:7 46:2 extension 38:25 extensions 39:2 extras 2:23 eyes 15:21,22 16:24</p>	<p>f facilitate 12:7 fact 2:15 12:13 14:5 16:9 21:23 41:5 factors 10:24 27:2 fail 47:2 failed 23:19 32:18 33:15 41:10 failure 38:6 fair 7:11 20:8,15 34:4 40:21 42:16 43:12 fairview 28:19 fall 12:11 families 16:16 17:1 17:4 21:9 22:18,19 22:23 23:21 36:21 42:23 46:5,10 family 7:14 20:24 40:16 far 3:23 16:14 20:11 25:17 28:2 fast 39:17 father 38:19 fault 15:3 federal 37:22 45:7 50:12 feel 27:18 42:14,19 43:1,23 fell 38:17 figures 39:25 40:1 fill 2:21 3:4 5:1 12:19,20,22 21:14 43:18 final 7:24 10:22 11:24 13:19,21 23:1 24:9 finalize 23:8,11 24:8 finalized 11:19 finally 13:15 24:22 finance 35:13 financial 34:16,20 financially 50:15</p>	<p>financing 35:10,13 find 13:23,23 26:10 27:7,7 35:5,17,19 finding 14:14 findings 4:12,12 11:4 finish 48:16 finished 2:24 4:22 first 8:20 14:19 18:4 24:4 29:14,20 43:21 fit 15:7 five 9:8,12 28:3 fixed 20:9 42:22 flexibility 20:4 21:4 flintridge 47:18 flores 29:14,17,18 29:18 32:16 39:4 flows 6:17 fluid 26:9,9 focus 6:18 folks 19:7 28:13 follow 35:25 followed 18:5 29:14 29:15 31:17,18 33:19 35:21 38:12 40:23 following 3:7 30:15 32:10 34:14 35:7 39:6,7,18 41:9,22 42:2 forced 26:12 foregoing 50:3,5,9 50:11 foreign 43:21 foreseeable 11:3 forever 25:9 forgot 2:23 form 15:8 formal 4:4,21,23,24 13:6 32:13 formed 30:8 former 5:17 14:18 forms 13:18 fort 5:16</p>
--	---	---	--

[forth - hopefully]

<p>forth 50:4 forum 27:5 forward 9:19,21 14:18 17:25 39:17 fought 38:20 found 26:18 foundation 7:18 four 47:9 48:17 fourth 20:17 frail 32:21 frame 14:13 fraud 26:20 free 38:19 freeway 18:10,17 28:12,23 45:23 frequently 39:8 friday 23:2 friends 26:25 front 3:16 fruition 15:17 fueled 40:13 funds 7:11 further 12:11 16:1 48:8 49:13 50:9,11 50:15 furthermore 31:5 35:1 future 9:9 11:3 25:11</p>	<p>generation 27:25 40:15 43:21 gentleman 27:19 gentlemen 43:20 gentrification 36:13 36:15,25 37:6 gerald 5:15 getting 8:18 16:24 47:18 gi 38:20 girl 18:9 give 3:8 5:4,5,10,12 5:23 16:20 17:6,7 26:24 27:5 45:17 given 15:5 50:10 giving 14:23 18:2 27:5 glendale 28:12 go 2:6 3:8,21 8:7,8 10:21 13:11,13,14 18:11 19:15 23:25 29:3 35:5 36:15 38:19 god 24:4 25:9 44:7 goes 8:6 42:12 47:20 48:10 going 2:21 4:8,11 6:21 8:22,23 10:6 15:2 17:12 18:11,12 18:21,22 19:6 24:7 24:9 25:10 28:10,23 29:7 36:4,8 38:22 46:11,24,24 47:21 48:1 gomez 41:23 49:6 gonna 2:6 3:25 5:5 5:12,13 13:16 14:17 28:4 35:25 46:9 48:15 good 2:5 4:9 18:14 19:16 24:1 27:14 28:18 43:19 gotten 6:3 government 16:6 17:11 22:2</p>	<p>governor 7:6 grab 2:6 graduate 40:17 grandparents 38:18 grant 38:25 granted 39:2 great 6:15 14:17 greater 17:1 green 2:19 3:14 12:19 30:2 39:4 grove 19:19 growing 27:24 grown 40:9 growth 10:25 12:5 40:11,12 guess 12:15 guidelines 8:16 guys 5:3 48:4</p>	<p>hearings 10:17 23:15,17 32:10,14 heaven 38:23 heck 14:16 held 17:21 44:23 help 13:1,23 24:4 25:9 42:11 47:14 hernandez 33:20 35:22 38:12,14,15 41:23 49:7 hey 48:4,6 hi 18:8 31:19 high 45:9 higher 16:11 17:3 36:24 highly 25:11 highways 6:9 9:2 46:17</p>
<p style="text-align: center;">g</p>		<p style="text-align: center;">h</p> <p>half 28:20 44:22 hand 18:16 handled 19:7 23:3 handouts 2:15 happen 11:18 29:5 happening 29:10 happens 25:8 26:6 harbinger 40:7 hard 32:20 harris 29:24 haul 27:11 hazardous 10:25 12:13 hazards 20:20 hcd 45:4,4,6,16 he'll 2:25 heads 31:9 health 16:25 20:4 37:20 heard 6:15 18:10 hearing 2:9 4:15 10:20 14:3,4,11 19:22 20:2 21:22 23:15 44:23</p>	<p>hike 25:10 hikes 30:10 36:17 hilda 49:7 hire 39:13 historic 12:10 history 38:16 hmm 48:12 hold 6:6 13:25 33:9 48:24 holden 41:24 49:8 holden's 5:16 holding 47:11 home 12:22 13:14 16:19,19 18:12 26:17 28:8 33:25 36:17 38:18 44:1,2 homeless 36:3,9 homelessness 36:12 homes 15:17 16:10 17:17,21 19:25 20:8 26:15 29:1 42:20 hong 1:21 50:24 hook 5:6 hope 17:24 19:9 27:9,9 hopefully 17:15 28:14</p>

[hoping - kosinski's]

<p>hoping 12:2 horrific 44:4 hospital 15:8 hour 44:23 hours 44:24 house 28:22 38:20 42:14 46:23 household 34:13 36:20 38:8 households 15:22 17:16 31:8,9 33:8 33:24 34:17 35:8 36:2,12 45:8 48:22 48:24 housekeeping 2:11 houses 5:22 6:23,25 7:14,14,15,17 14:5 15:25 29:2,6,9 42:17,23 housing 6:12 7:10 16:8,16 28:5 30:1 35:6,13,17,19,20 36:8 37:13,17,18 42:15 45:10,16 howle 26:22 hugo 31:18 33:20 35:21,23 39:3 48:14 hugo's 38:24 huizar 48:4 49:6 human 37:24 hundred 7:1,2 11:22 hunt 35:19 hyphen 19:18</p>	<p>ii 38:20 illustrates 37:19 imagine 26:24 immediate 9:15 immediately 9:18,22 9:24 immigrant 31:10 immigrants 40:15 immigration 40:14 immune 26:5 impact 11:1,10,21 11:23,25 15:24 20:1 21:8,9 30:15,18,24 32:4 34:15 35:8 36:2 37:23 45:18,25 46:3,11,13 47:2 48:13 impacted 6:11 31:6 47:21 impacts 10:2,3,9,12 11:5,11,13 12:1,5,8 12:12 23:21 35:7 36:25 46:16 48:10 implemented 8:6 24:14 implications 25:21 important 38:25 imprecise 26:9 improvements 20:13 improving 37:10 incidentally 6:5 include 13:21 32:11 47:4 included 45:22,24 including 23:21 37:4 41:18 income 7:14,14 16:4 16:14,25,25 20:5 21:5,6,20 22:6,6,14 22:20,21 36:21 45:2 45:3,4,7,11,12,13,14 incomes 45:15 increase 20:17 35:9</p>	<p>increases 19:21,23 20:7,16 21:1,2 26:1 36:17,18 indicate 15:24 38:3 individual 14:8 individuals 3:12 32:12 inducement 10:25 inducing 12:5 influx 40:12 inform 32:18 information 2:17,18 4:7,8 8:10 14:9,10 31:12 32:6 40:18 41:14,19 49:14 informed 4:9 initiation 30:10 input 4:14,16 inquiry 28:14 insanity 20:25 insightful 8:5 inspected 20:21 instance 34:23 institutional 31:14 intangible 36:10 intelligent 44:8 intended 22:18 intent 6:12 7:25 16:4 interest 27:8,12 interested 8:4 50:16 interrupt 8:19 intertwined 20:1 interwoven 20:1 introduce 3:13 introduced 6:1 invite 14:18 involved 47:24 involving 30:14 ironically 39:14 isolated 26:6 issue 7:16 33:7 39:14 42:22 48:21 48:23</p>	<p>issued 30:17,23 issues 42:15 43:4</p> <p style="text-align: center;">j</p> <p>january 22:7 jargon 30:21 31:4 jennifer 30:4 39:5 jerry 29:23 jessica 1:21 50:24 jim 28:17,18 jimmy 41:23 49:5 job 1:23 6:15 17:1 joe 29:15 31:18 33:19,21 36:1 johnson 5:15 jones 25:17,18 jose 48:4 49:6 july 30:16,22 32:8 45:21 jumped 40:5 june 10:15 justice 37:9 justified 21:1 33:12 34:2</p> <p style="text-align: center;">k</p> <p>kamala 29:23 keep 8:22 28:6 kelly 29:25 41:8 kept 42:19 kevin 49:5 kids 27:24 kind 6:16 18:17,25 know 8:17 10:15 15:2 18:15 19:6,8 24:6 27:16,22 29:10 38:22 43:1,20 47:24 knowledgeable 8:9 known 23:21 kosinski 3:16 5:14 5:19,20 8:13 13:9 14:1 30:5 44:20 kosinski's 34:8</p>
<p style="text-align: center;">i</p> <p>ibsen 18:5 19:14,15 19:17 25:24 idea 11:17 ideas 37:3 identification 9:3 identified 6:7 identify 38:1,2 ignore 22:25 ignored 21:24 22:1 31:11</p>			

<p>l</p> <p>la 37:15</p> <p>la. 25:3,3 45:5 48:3 48:7,9 49:6,6</p> <p>la 21:16 28:12 47:18</p> <p>la32 47:9</p> <p>lack 21:3 32:25 39:11</p> <p>ladies 43:19</p> <p>land 10:24 30:3,5 46:22</p> <p>landscaping 37:5</p> <p>language 11:24 31:7 32:19 33:7 39:8,16 39:16 41:14,16,20 43:21,22 48:21</p> <p>languages 20:24</p> <p>languished 15:14</p> <p>laptops 3:22,23</p> <p>large 36:17</p> <p>largest 39:23 46:10</p> <p>latino 31:15 33:18 35:1 39:22,23 40:5 40:8,21</p> <p>latinos 39:20 40:2,8 40:9,10,13</p> <p>law 13:20 21:24 22:13 45:6</p> <p>lawn 28:8</p> <p>laws 46:17</p> <p>lawsuit 26:18</p> <p>lead 20:25</p> <p>leader 5:16</p> <p>leads 27:3</p> <p>leave 2:14 3:4 12:21 12:21 13:14 27:8</p> <p>led 12:14</p> <p>legal 30:21 31:4,24 38:10</p> <p>legislation 7:18,19</p> <p>legislative 15:15</p> <p>legislature 15:1 17:11</p>	<p>legislatures 41:22</p> <p>legitimate 15:20</p> <p>lending 35:15</p> <p>letter 13:9 30:5 32:24 39:3 41:6,9 41:22 48:3 49:5</p> <p>letters 32:23 44:4</p> <p>liberally 22:22</p> <p>library 32:21 47:12</p> <p>lifetimes 17:14,14</p> <p>light 17:25 18:14</p> <p>likewise 45:11</p> <p>limited 21:21 41:18 45:22,23</p> <p>line 40:19</p> <p>lines 37:8</p> <p>linguistic 33:17 40:20 42:1</p> <p>linked 24:21</p> <p>lisa 38:13 40:24 42:7,8,12</p> <p>list 11:25 45:3</p> <p>listed 11:20</p> <p>listening 27:16</p> <p>little 5:22 7:4 18:9 25:1 28:20,21,25 38:16 48:8 49:11</p> <p>liu 41:24 42:19 49:8</p> <p>live 27:2 29:7,18 39:20 42:20 43:25</p> <p>lived 18:11 31:21 43:25</p> <p>lives 25:24</p> <p>living 12:4 27:17</p> <p>local 11:6,8 41:3,7</p> <p>located 7:1 22:9</p> <p>location 46:11</p> <p>logic 32:24</p> <p>loma 21:16</p> <p>long 5:25 16:5 27:11 27:11 40:1</p> <p>longer 6:8,11 7:21 43:2</p> <p>look 2:15 3:21 10:20 26:11 29:1</p>	<p>looking 6:20 10:1 18:19 38:22</p> <p>looks 2:19 3:2 11:1</p> <p>los 7:3 16:5,12 22:10 27:17 33:21 37:14 39:23 45:3,10 48:5 48:12</p> <p>loss 37:13</p> <p>lost 42:9</p> <p>lot 2:17 19:2 27:16 27:22 28:24 29:9,17</p> <p>love 38:17</p> <p>lovely 19:1</p> <p>low 7:14 12:8 22:19 22:21 36:20 45:2,4 45:7,11,12</p> <p>lowden 30:4 39:5</p> <p>lsa 3:12,19</p> <p>ludicrous 36:4</p> <p>lunch 18:15</p> <p style="text-align: center;">m</p> <p>machine 50:7</p> <p>mail 3:7 12:23 13:9 20:25</p> <p>mailer 3:5</p> <p>main 32:25</p> <p>maintain 7:15</p> <p>maintained 20:9</p> <p>maintaining 6:16</p> <p>maintenance 7:16 20:13 21:3 26:17 42:20 44:3</p> <p>majority 5:16 6:5</p> <p>maker 23:10</p> <p>makers 10:10</p> <p>making 5:18 8:5 18:14 38:5 43:15</p> <p>malcolm 29:24 41:8</p> <p>man 43:12</p> <p>management 6:14</p> <p>manipulation 27:2</p> <p>manner 38:3 40:22</p> <p>manning 3:19</p>	<p>manufacturing 24:19</p> <p>map 6:21 47:23</p> <p>maps 29:1</p> <p>marcelo 40:16</p> <p>march 39:4 41:6</p> <p>marchain 18:5,8,8</p> <p>marie 18:5 19:11,17 25:24</p> <p>market 7:11 20:8,15 35:16 42:16 43:12</p> <p>married 19:16</p> <p>marvelous 18:19</p> <p>massive 34:1</p> <p>matter 15:18</p> <p>matters 15:19 39:1</p> <p>mcdonald 46:23</p> <p>mean 19:8 43:8,10</p> <p>meaning 38:17</p> <p>meaningfully 32:1</p> <p>means 46:1</p> <p>measure 45:1</p> <p>media 45:5</p> <p>median 16:4,14 21:4 21:6 22:6 45:9,13</p> <p>medium 45:2</p> <p>meet 23:19 27:5</p> <p>meeting 1:2,12 2:7 3:1,8,20 4:6,19 7:25 9:16 28:3 32:10</p> <p>meetings 2:10 41:11 41:21</p> <p>member 41:23,24 47:9 48:4 49:5,6,8</p> <p>members 4:23 34:1 37:18</p> <p>mention 5:14 6:22 13:17 14:19</p> <p>mentioned 3:15 4:16,20,21 6:20 9:16 12:18 13:3 32:16</p> <p>merge 23:8</p> <p>merged 23:13,14,17</p>
--	--	---	---

[message - ordered]

<p>message 27:9,9 messages 26:7 met 17:18,19 metadata 45:20 mic 4:17 michael 41:8 microphone 5:3 middle 2:23 37:9 miles 41:8 miller 28:17,18,19 million 39:20,21,22 40:2,3,6,10 mind 15:7 33:14 44:21 mindful 5:7 mine 15:12 minimize 10:12 35:11 36:11 minimum 17:8 minorities 36:20 minority 37:11 minus 5:5 minute 14:1 43:4 minutes 5:5,6,9,13 5:25 28:3 miscarriage 37:9 misdirected 34:9 mismanagement 26:21,23 mission 11:7 mitigate 23:20 38:6 46:15 mitigated 38:4 mitigation 36:3 45:1 moderate 7:14 22:19,21 45:2,13 modifications 15:23 16:15 mold 42:20 mom 42:13 monday 2:2 money 47:16,19 monolingual 32:15 33:13</p>	<p>monster 47:14 month 17:13 monthly 20:18 months 17:13 33:3 42:3 48:19 moratorium 19:21 21:2 mother 18:14 28:20 38:21 move 9:18 25:25 36:23 moving 9:21 15:13 17:25 20:18 moynahan 26:3</p> <hr/> <p style="text-align: center;">n</p> <hr/> <p>n 19:17 name 3:10 5:20 12:17 14:21,21 18:6 18:8 19:12,15,16,17 21:15 27:14 28:18 29:18 31:19 35:23 38:14 40:25 42:12 50:19 nation 37:7 39:24 nation's 40:8,10 national 37:21 40:7 natural 36:16 navigate 13:2 necessary 6:8 33:12 33:15 need 2:21 4:9 5:1 12:6 13:6 20:20 23:17 24:23 26:11 28:5 34:11 36:5 42:15 43:1,2 46:6,9 needed 9:4 41:21 needs 33:17 35:2 36:8 40:19,20 42:1 42:1,16 46:4 47:3 48:22 neglect 26:3,5 neighborhood 37:8 37:10 47:10</p>	<p>neighborhoods 27:24 neighbors 25:22 26:25 38:16 neither 50:15 nepa 37:22 38:9 nepotism 26:23 nesters 16:18 net 16:24,25 never 20:12 neverland 15:15 new 11:13 29:13 36:24 37:3 39:25 44:4 newcomers 37:10 newly 33:11 36:3,8 nicely 28:11 noise 37:5 non 46:22 noncommittal 36:11 nonprofit 46:24 nonsignificant 11:21 normal 24:20 north 6:21 34:10 47:21 48:3,8 noted 41:9 49:18 notice 3:22 10:15 21:22 32:8 notices 41:18 november 33:6 42:6 48:20 nuisance 37:6 number 3:22 6:24 15:13 34:19 35:11 36:18 41:11,14 46:10 numbered 40:9 numbers 11:21 45:17</p> <hr/> <p style="text-align: center;">o</p> <hr/> <p>oath 50:6 objective 26:12</p>	<p>observations 34:14 obtain 35:10 obviously 13:15 occupant 24:3 occupants 35:9,16 occupied 46:25 occur 11:6,12,17 12:9 46:12 october 7:6 24:6 odd 7:1 offer 7:8 28:7 office 5:16 34:8 officially 14:15 officials 41:3,7 oh 13:24 18:13 24:20 okay 4:20 5:19 10:5 14:17 18:4 19:16 24:4,12,15 25:5,7 25:25 28:16 29:13 31:22 42:8,12,22 47:8,15,20 48:2 old 29:9 older 7:17 omitted 48:16 once 9:3 19:20 44:24 online 13:11,14 ooo 2:3 open 34:22 35:2 49:15 opening 27:19 operating 24:4 opportunity 10:7 11:16 14:24 15:9 32:5,11 44:2 opposite 16:21 option 9:4,5,7,7,10 9:11,22 options 10:1,1,14 oral 4:21 13:16 orange 19:18 order 13:5 16:3 17:6 17:13 33:12 ordered 20:8</p>
--	---	--	---

[organization - projects]

<p>organization 21:17 organize 27:6 organizing 35:25 41:2 49:4 original 33:4 42:4,5 48:19 50:12 originally 17:4 orozco 40:16 outcome 16:2 17:10 27:11 outlined 36:10 outreach 33:16 40:20 41:4,11 43:5 overall 45:23 overview 3:25 5:23 owner 24:2 owners 11:13 19:5 ownership 8:24 owns 42:14</p>	<p>41:1 43:25 pass 5:13 12:15 passed 7:19 16:18 17:4 patrick 26:3 peeling 20:19 pending 15:19 people 7:15 8:9 13:1 16:9 17:9 22:20,21 25:24 26:4,24 27:4 27:22,22 28:5,10,13 29:6 35:11 42:21 43:24 44:25 45:8 46:8 perceived 20:8 percent 16:3 20:7,17 25:10 26:14,14 31:8 40:3,6,9,11 45:5 period 4:21 8:3 9:9 9:12 13:4,8,8 14:6 24:5 33:6,11 39:3 42:5 43:2 persistence 35:17 person 9:25 12:17 39:10 41:20 43:15 44:7,8,18 persons 22:18,19,23 pertains 50:11 pew 40:11 phd 44:9 phillips 5:15 phone 26:7 phrase 26:2 physical 36:25 pick 2:25 picked 2:19 3:2 picking 3:15 place 2:11 9:1 17:9 27:22 50:4 plan 11:6,8 36:6 planning 5:21 plans 11:7 please 2:13 8:19 17:6 21:14 39:3</p>	<p>plus 5:5 point 6:3 7:23 16:3 23:1 40:18 pointed 20:21 points 26:23 31:14 48:18 policy 37:22 41:12 political 37:1 politicians 28:4 poor 37:11 population 31:10 36:9 39:17,22 40:3 40:5,7,8 populations 39:24 portals 48:6 position 30:9 possibility 38:10 possible 24:24 potential 11:5 12:8 12:10,13 35:9 practices 41:4 preamble 16:7 precedent 39:1 precise 26:8 predominant 35:1 predominantly 21:18 prefer 15:6,11 preparation 10:15 prepare 10:22 15:4 17:8,13 prepared 32:17 45:19,20 46:4 preparing 10:16 present 11:2 17:4 36:5 presentation 3:18 4:22 32:11 presenter 15:9 preservation 16:8 16:10 preserve 16:9 pretty 18:14 44:9 prevent 22:23</p>	<p>previous 19:3,5 prices 7:9 36:15,18 pricing 18:21,25 28:6 primarily 4:6 6:25 30:7 primary 41:16,20 principally 40:21 prior 23:16 50:5 private 26:15 28:1 probably 6:17 17:12 19:7 problem 25:1 42:10 procedural 23:19 procedure 23:17 32:23 39:6 procedures 23:4 proceed 14:14 proceedings 32:17 50:3,5,7,13 process 4:4,10,11,14 7:5 8:2 10:7,14,20 13:23 18:21 19:23 23:3,4,5,9,11 24:11 30:13 32:3 33:25 44:22 processes 19:25 23:8,12,14 products 35:14 professor 40:17 profit 46:22 program 7:22 11:15 20:6,7 21:22 30:11 41:13 45:25 46:19 46:20 47:3 programs 21:7 project 2:17 6:1,11 8:21,22 24:7,12,13 38:2,3,7,22 47:15 47:25 projected 34:13 38:8 projects 6:18 11:2,3 34:9</p>
p			
<p>p.m. 1:11,11 2:2 49:18 page 24:21,22 34:12 pages 1:25 pain 27:18 painful 37:6 paint 12:14 20:19 42:21 pamphlet 20:23 parents 38:16,22 part 3:11,17 4:4,24 13:6,19,22 22:10 34:24 38:10 48:2 participate 32:2 particular 28:2,6 particularly 30:12 32:15 party 50:17 pasadena 2:1 6:4,4 6:20,21 7:2,3 10:19 11:6,7 16:11,12 18:11 19:19 21:16 21:19 22:9,10 28:19 28:21,22,25 29:19</p>			

[properties - rents]

<p>properties 6:2,3,6,7 6:10,14,16,19 7:2,3 7:8,10,20 8:24 9:3,5 9:8,11,13,14,17,23 11:9 12:4,11 18:20 20:14,15 22:8 24:15 29:9 46:21,25 47:1 47:11,23 48:1 property 1:1 2:8 6:13 7:12 22:4 28:3 30:20,25 32:5 47:16 47:22 proportion 36:19 proposal 5:22 proposed 3:25 15:23 16:1,2,2,15 18:13 21:8 25:7,12 45:1 proposing 4:2 prospective 35:14 protect 20:24 provide 4:6,23 6:12 8:10 32:12 41:14 provided 31:7,12 32:12 34:6 35:16 provides 7:11 47:15 provisions 21:23 public 1:2 2:8 4:5,7 4:15,16,23 10:10,17 10:19 12:6,14 13:4 14:3,4 27:16 32:9 32:13 33:4,5 37:5 39:2,12 41:21 42:4 42:5 46:15 48:19 purchase 11:16 12:3 15:25 35:10,16 purely 23:19 purpose 4:6 6:10 purposes 4:19 45:11 45:14 pushed 36:16 put 3:6 19:2 24:22 26:17 43:9 puts 20:18 39:11</p>	<p style="text-align: center;">q</p> <p>q&a 4:16 qualification 19:24 41:13 qualifications 17:19 17:20 qualify 17:5,16 20:5 qualifying 21:6 quality 23:6 37:24 37:25 quarter 25:10 49:10 quarters 40:4 question 29:7 questions 3:21 18:20 19:9 27:21 29:12 49:13 queue 5:4 29:16 quick 2:11 quickly 3:13 quite 25:5 27:19 28:11 quote 22:2 40:16 quotes 25:12</p>	<p>readily 35:15 reading 43:9 ready 12:24 real 25:24,24 27:3 really 18:24,25 19:8 24:10 reason 21:20 23:19 reasonable 33:12 41:17 reasons 39:7 receive 4:5,14,25 10:21 12:25 received 3:1 31:2 receiving 4:15 44:18 recipe 36:3 recognize 38:6 41:25 recommend 25:11 recommendations 41:10 recommended 13:19 record 1:12 2:14 4:5 4:24 5:2 13:6 14:22 15:12 18:7 50:6,9 recording 4:19 records 23:13 reduce 16:23,24 reduction 36:20 reference 39:3 references 24:24 referred 32:4 reflect 11:9 21:3 45:15 regard 18:20 19:3 21:8 regarded 15:6 regarding 14:9 34:13 39:15 regardless 15:19 regards 20:5 27:18 regional 16:13 regulation 8:1,16 23:3 24:10</p>	<p>regulations 7:5,23 7:24 8:1,4,5,11 9:20 14:3,6,9,11,12,15 15:23 16:1 21:25 22:25 23:2,6,9,12 24:8,8,13,20 26:9 27:6,10 30:11,14,18 39:8,10,11 43:3 45:7 46:1,3,18 47:1 regulatory 17:5 24:17 30:18 39:16 rehabilitation 7:12 related 30:13,16,19 30:24 32:3 33:1 relates 39:18 relative 50:16 released 45:21 relocate 35:17 46:9 relocated 21:10,10 33:25 relocation 15:24 36:6 45:18,25 46:2 relocations 10:24 11:17 12:1,2 35:7 rely 14:9 remaining 7:10 38:7 remains 30:12 remark 14:8 15:4 remarks 15:9,11 remember 18:6,10 48:4 remind 49:11 removal 20:20 remove 6:13 42:16 43:12 removed 42:17 rent 8:24 19:23,24 20:6 21:7 26:1 30:10,11 36:16 41:13 rental 6:19 19:21 20:14,16 21:1,2,3 renters 36:15 rents 20:11,12 36:17 37:12</p>
	<p style="text-align: center;">r</p> <p>r 19:18,18 race 37:2 racial 36:19 37:7 racism 31:14 raise 20:11 raised 20:12 raises 38:9 ramp 28:23 rate 36:24 rates 21:3 raul 2:22 3:14 ravine 38:17 raymond 27:13,14 27:15 reach 20:7 reactions 26:7 read 18:23 19:5 22:1 22:16 26:25 43:4 44:8</p>		

[repair - shatz]

<p>repair 21:4 repairs 7:13 repeatedly 41:2 replaced 36:21 report 15:24 20:1 21:9 26:25 30:15,24 45:19,20 46:1,3,13 47:2 reported 1:20 31:3 39:20 reporter 4:18 13:17 50:2 reports 16:2 35:6 represent 31:21 representatives 41:7 represents 41:15 request 33:12 49:2 requested 50:14 requesting 34:5 48:17 requests 42:2 require 24:14 required 7:21 13:20 requirement 23:20 requirements 20:5 requires 37:22 38:1 46:18 research 40:12 residence 11:13 20:21 resident 24:3 38:15 residential 31:23 33:18 residents 30:17,20 30:23 31:11,13,16 32:16 33:13 34:6,18 34:21,21,25 35:2,5 37:11 38:11 40:5,15 residing 30:7 resolution 15:13,18 48:5,11 resources 10:25 12:9 39:13 46:15 respond 13:21</p>	<p>response 20:22 49:2 result 11:18 12:6 36:13,19 37:1 resulting 12:9 retain 8:24 9:9 retained 9:10 retaining 9:22 retraining 17:2 return 3:6,6 16:19 26:7 returned 26:8 returning 16:19 revamping 30:10 reveal 46:7,8 revert 44:21 review 4:4,10 10:7 32:20 49:13 50:13 revise 33:5 revisions 16:1,22 17:6,17 right 2:5 9:17 10:6 10:14 11:16,20 13:25 29:16 30:3,4 43:1 rights 9:9,12,14,23 9:24 22:24 rise 40:8 risigari 18:6 19:14 19:16,17 riveter 38:21 road 21:2,16 24:2 47:8 roberti 5:18 7:19 14:18,23,24,25,25 15:25 16:5,7,18 17:18 20:2 21:24 22:3,7,11,15,22 25:18 27:8 45:12,14 46:16,19 roberto 29:14,17,18 39:4 role 6:14 ron 3:16 5:13,18,20 10:5 13:3,9,23 34:8 44:19</p>	<p>ronald 46:23 roof 26:17 root 29:8 roughly 31:7 36:5 route 6:1 18:13 30:19,25 32:4 rules 16:1 46:3 ryan 3:19</p> <hr/> <p style="text-align: center;">s</p> <hr/> <p>s 19:17,18 safety 20:4 sake 29:15 sale 7:8,12 9:5,11,14 11:18 12:5 19:25 33:25 46:21,22,22 47:22 sales 1:1 2:8 7:22 9:1,7,15,21 11:15 19:24 20:6 21:7 30:14,17,20,25 32:5 45:25 46:19 47:3,4 47:4,11,16 saw 25:24 saying 36:1 46:7 says 4:3 21:22 24:16 26:22 27:9 42:8 45:20 48:6,6 schedule 49:16 school 40:17 46:23 scope 19:22 screen 5:8 13:10 seat 2:7 second 2:10 13:25 23:22 40:14 44:15 44:16,17 secretary 8:15 29:25 section 11:1 16:6 22:15 46:18 sections 23:1 sector 26:15 see 13:10 20:11 24:15 27:1 28:14 seek 35:18</p>	<p>seen 24:3 30:9 select 46:23,25 self 3:5 31:3 sell 5:22 6:10 9:5,8 9:17,18 14:5 selling 9:22,23 18:19 senator 5:17 14:18 25:18 27:8 41:23,24 49:5,7,7 senior 43:5,8 seniors 43:6,6 sense 22:5 23:12 sent 41:7 44:19 separate 22:20 23:4 separated 23:18 september 8:4,16 13:5,7 14:13 20:16 20:19 23:7 25:25 sequoia 46:23 sereno 6:4,5 7:4 10:18 15:5 16:12 22:10 24:2,3,25 30:7,17,20,23 31:6 31:8,11,16,21,23,23 32:7,20 33:1,9,18 34:16,18,20 35:1,5 35:24,25 36:9,14 38:10,15 40:21 41:1 42:1,13 47:8,11,12 48:25 49:3 series 2:10 serious 27:21,21 37:1 services 12:6 28:7 session 4:16 sessions 32:6 set 3:5 12:24 13:13 13:24 18:21 50:4 settled 15:21 severe 37:16 severely 31:6 34:25 shatz 38:13 40:23,25 40:25</p>
---	---	--	--

<p>sheet 2:16 shift 39:18,25 short 27:12 shortage 37:16 shorthand 50:1,7 show 47:23,25 shows 26:4 shy 49:11 side 3:6 sign 2:13 signature 50:23 signed 2:12 7:7 41:22 significant 11:5,14 11:23,25 12:1,9,12 38:1,4,6 significantly 37:24 simply 13:1 16:11 17:21 single 7:13 44:7 singles 36:21 sit 12:25 situated 39:7 situation 17:23 six 29:21 size 36:20 skills 41:18,20 43:7 skin 47:19 skyrocketing 37:12 slightly 32:22 small 39:12 social 21:8 36:25 37:9 software 13:2,12 sold 7:10,21 11:9 29:2 36:22 42:18 solely 22:12,12 solidify 27:11 solis 49:7 solution 28:1 solutions 36:10 soon 9:19,20 19:10 sorry 12:16 19:12 44:10</p>	<p>sort 9:2 south 6:4 7:2,7 11:7 16:11 18:11 19:19 21:18 22:9 28:19,21 28:25 29:19 34:10 41:1 48:7 spanish 2:16 31:5,7 31:9 32:15 33:7,10 33:13 34:7 43:23 48:21,24 49:1 speak 5:1,1,12,12 14:24 15:9 21:14 25:16 28:6 32:12 43:17,17,21 44:15 44:16,16,25 speaker 3:15 5:1 12:19 13:24 18:4 19:3,11 21:12 23:24 25:15,17 27:13 28:17 29:14 43:16 49:10 speaker's 2:20 speakers 5:9 speaking 3:17,25 31:5,9 32:15 33:13 speaks 43:22 special 16:23,24 specific 6:22 8:2 11:8 33:17 specifically 8:7 36:7 specifies 7:7 spelled 19:17 spoke 13:9 spoken 43:16 44:24 sr 1:1 2:8 45:23 48:2 staff 2:22 3:13 staggeringly 17:2 stamp 3:7 stand 44:10 standardized 30:18 standards 37:4 start 9:21 17:20 started 2:6,7 6:2 starting 22:7 40:15</p>	<p>state 14:20 18:6 22:1 26:21 30:19,25 31:3 32:4 37:13 39:15,21,24 40:1,4 41:22 50:2 state's 40:6 statement 29:21,22 38:25 states 9:2 34:2 35:19 40:13 statewide 22:4 statistic 33:22 statutes 38:9 stay 6:17 27:23 stick 29:10 sticking 49:12 stipulation 33:7 stock 35:6 strange 48:12 street 11:7 streets 6:9 46:17 studies 24:21,23 40:18 study 6:8,19,24 34:11 43:3 47:21 suarez 40:16 subject 6:13 22:18 28:3 submit 12:18,20 submitted 13:7 44:17 subscribed 50:18 subsequent 11:13 substandard 41:4 substantial 31:10 substantive 32:6 subsurface 9:9,12 9:14,23,24 suggested 17:5,7 summary 4:12 11:3 25:4 supervisor 49:7 supposed 8:17 sure 4:1,7,14,25 8:8 8:8 13:2 19:12 28:9</p>	<p>surfaces 12:13 surgery 15:8 surplus 1:1 2:8 7:8 12:10 22:4 30:19,25 32:4 survey 30:3 surveys 30:5 sutton 21:13,15,15 44:12,13 swear 44:7</p>
t			
<p>take 5:23,24 8:1,14 9:1 12:22 13:16 16:15,22 18:23 26:11 46:25 47:1 taken 17:9 32:5 39:19 50:3 takes 17:24 27:21 talk 5:22 7:4 8:19 talking 4:3 25:22,23 27:1 team 3:11 technical 24:20,21 24:23 30:21 31:4,24 tell 29:3 42:21 tenant 15:22 19:20 21:17 29:20 42:13 tenants 7:9 11:15 12:3 15:14,19 19:1 20:3 21:6,17 25:19 25:20 26:13 27:11 29:22 30:6,8,12 31:1,2,20,22 33:1,2 35:3,24 36:5,15,23 36:24 41:1,15,17,19 41:21 42:14,15,19 49:3 term 27:12 terrible 43:5 testifying 50:6 testimony 15:5,6 50:10 text 15:23</p>			

[thank - war]

<p>thank 5:19 10:5 14:23 15:12 17:25 18:2,4 19:10 21:11 21:12 23:23 25:14 25:18 27:4,12,15,15 28:15,16 29:12,13 31:17 33:19 35:20 35:21 38:11 40:22 40:23 42:6,7 43:13 43:14 44:10,12 47:5 47:6 48:13,14 49:2 49:9,15 thanks 49:8 theoretical 25:23 27:1 thereof 50:18 theresa 33:20 35:22 38:12,14 thievery 20:10 thing 14:2 18:17 20:10 22:16 things 2:11 8:23 15:1 18:14 19:2,8 24:20 28:24 29:17 43:8,10,11,11 think 12:22 14:17 17:8 18:18 38:21 48:13 thinking 18:18 third 21:25 36:5 40:14 thomas 3:18 thought 15:10 18:13 three 5:3,4,6,8,12 22:9,12 33:3 40:4 41:16 42:3 45:15 46:7 47:17 48:18 thursday 9:16 10:18 15:3,4 21:20 thursdays 47:13 tickets 38:19 time 5:3,7,11,25 6:2 8:21 14:13 17:6,15 17:18 18:18 20:23 22:17 23:22 25:16</p>	<p>29:16 33:13 34:5,11 38:24 40:1 43:18 44:1,15,17,24 49:16 49:18 50:4 timely 49:2 times 25:3,3 34:8,9 titles 30:22 today 4:15 5:21 7:25 8:13,14 10:2 14:7 31:22 39:17 told 8:13,14 14:7 44:16 tom 23:24,24 24:1 47:6,7 tonight 2:8,9,21 3:13,24 4:4 5:17 10:19 13:16 45:18 49:17 topics 10:23 total 9:13 transcribed 50:8 transcript 50:12,14 translating 32:23,24 32:25 transparent 35:2 transportation 8:15 30:1 35:12 transportations 6:18 treat 26:4 treatment 31:13 trees 20:19 tremendous 37:13 trimming 20:23 true 50:9 try 5:10 11:23 47:14 trying 44:21 tuesday 47:12 tunnel 9:10 18:1 29:2,3,5,8,12 48:10 turn 25:16 45:16 turned 28:23 44:15 turnover 36:16 two 2:10 10:17 17:13 20:23 21:23</p>	<p>22:20 23:7,12,13,14 34:8 39:2 41:14 44:23 47:7 48:25 type 13:1 20:9 49:15 types 11:11 typical 28:21</p> <p style="text-align: center;">u</p> <p>ucla 40:17 uct 30:11 31:3,13 34:1,5,16,23 36:9 37:21 38:5 41:1 42:2 48:17 uct's 39:3 unable 30:20 31:3 31:23 32:1 unanimous 48:11 uncertainty 15:16 unclear 39:8 unconscionable 37:19 underneath 29:6 undersigned 50:1 understand 13:3 24:7 25:21 32:17 34:1 43:22 44:9 47:14 understanding 4:1 8:2 39:15 42:18 unfortunately 38:16 united 20:2 25:19 29:22 30:6,7,12 31:21 33:2 35:19,24 40:13 49:3 units 36:24 unnecessarily 39:9 upgrade 16:7,9,10 uprooting 36:2 upset 28:22 urban 35:19 url 13:13 use 10:24 21:4 25:2 43:7 useful 2:18</p>	<p>usually 19:15 45:5</p> <p style="text-align: center;">v</p> <p>vacancies 26:14,14 26:16 35:18 vacant 46:21,22 value 7:11 20:8,15 42:16 43:13 variation 9:6,6,8,10 9:11,15,17 various 9:25 10:8 vast 6:4 velasquez 3:14 verbal 14:8 verbally 8:13,14 14:7 vibrations 29:5 viewed 37:8 views 36:2 violation 38:9 vocabulary 42:17 43:13 voice 42:9 vulnerable 36:14 37:18</p> <p style="text-align: center;">w</p> <p>wait 23:10 43:4 waited 17:10 waiting 18:1 wake 30:9 walk 2:25 walked 2:12 walking 2:22 wall 3:23 wanna 4:7,14 12:15 13:8 17:24 27:4,6,8 28:9 43:17 49:11,15 want 4:9,25 15:12 24:15 25:18 27:23 28:9,13 29:22 43:20 44:25 45:15 wanted 5:14 43:17 wants 5:12 war 38:20</p>
---	---	---	---

[warwick - zip]

warwick 33:21	wrong 19:13 24:18
waste 10:25 12:13	y
wave 2:25	yard 28:9
way 8:23 16:17 17:3 25:5 28:12 30:3,5 43:7,15 47:20	year 9:8,12 24:2 25:2 44:22
ways 10:12 22:5	years 5:25 6:24 17:9 17:9,15 18:2,2 19:2 24:4 25:6 26:13 27:17 29:20 31:21 42:13,13 44:1
we've 4:11,13 6:2 18:1	young 36:21
web 24:21,22	z
website 14:15	zip 22:13 45:15
wednesday 47:12	
week 15:7 28:4 45:19 46:13	
welcome 47:20	
welfare 37:20	
went 25:1,3	
white 3:2 12:20	
whites 39:21 40:3	
wife's 15:7	
wiliams 24:1	
williams 8:11 23:24 23:24 24:1 47:6,7,8	
willing 28:7	
win 17:23,23	
window 18:16	
witness 50:18	
witnesses 50:5	
woman 28:21	
women 28:25	
wonderful 8:23	
wondering 15:15	
word 8:14	
wording 42:16 43:7	
words 36:1	
work 28:4,14	
working 34:15 35:12	
workshops 33:9 47:11 48:25	
world 38:20	
worried 27:20 28:25	
write 34:7	
written 30:6	

T2-1-1

This comment raises concern about income data. The proposed regulation complies with current law. Government Code Section 54236(h) specifies how median income should be determined. Caltrans based median income on the best available information and upon the recommendations of the California Department of Housing and Community Development (HCD). For this reason, no change was made to the proposed regulation.

T2-1-2

Please see response to T1-2-1.

T2-1-3

Caltrans has made every effort to provide affordable buyers with the opportunity to buy the homes they occupy at affordable prices, and to prepare these potential buyers to purchase the properties. Four homebuyer's classes were held in Los Angeles and Pasadena in January, 2015, and more classes are planned. In addition, the proposed regulation allows prospective buyers 120 calendar days from the postmarked date of mailing or the publish date of the Conditional Offer Prior to Sale to respond, 30 calendar days to respond to the Contract for Sale, and an additional 120 days to close escrow. While Caltrans is committed to selling the properties as soon as possible, an exact timeline is undeterminable at this time. To assist prospective buyers in preparing to purchase, properties identified for future sale will be posted on the continuously updated website here:
<http://www.dot.ca.gov/dist07/business/710sales/>.

T2-1-4

Please see response to T2-1-3.

T1-1-5

Please see response to T2-1-3.

T2-2-1

Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790.

T2-2-2

Please see response to T2-2-1.

T2-3-1

Per the 2012 audit, it was found that Caltrans passed up roughly \$22 million in rental income for these properties due to the fact that Caltrans failed to charge rents at the market rate for the majority of the properties. Therefore, Caltrans uses fair market rent determinations for all the properties and adjust the tenants' rents to fair market after providing them with proper notice.

T2-3-2

This comment request a moratorium of rental increase. Please see response to T2-3-1.

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184

T2-4-1

This comment raises concern about income data. The proposed regulation complies with current law. Government Code Section 54236(h) specifies how median income should be determined. Caltrans based median income on the best available information and upon the recommendations of the California Department of Housing and Community Development (HCD). For this reason, no change was made to the proposed regulation.

T2-4-2

Please see response T2-4-1.

T2-4-3

Caltrans respectfully disagrees with the comment that the Draft EIR failed to comply with CEQA. The Affordable Sales Program is governed by statute, including the Roberti law and the Administrative Procedure Act.

T2-4-4

Caltrans complies with all requirements of the APA Rulemaking process. The public comment period was extended to 55 days, ending on August 24, 2015 to provide public comment on non-substantial and sufficiently-related changes on the proposed regulations and SRIA. The sale of the Caltrans-owned 710 properties also requires that the state comply with CEQA which are separate provisions to the APA procedures.

T2-5-1

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

T2-5-2

The District Director of Caltrans District 7 will certify the EIR. The proposed regulations are in full compliance with the provisions of the APA, in that they adhere to the requirements regarding authority, reference, clarity, consistency, necessity, and non-duplication. The sale of the Caltrans-owned 710 properties also requires that the state comply with CEQA which are separate provisions to the APA procedures.

T2-5-3

This comment requests clarification of the proposed “project.” The word “project” was replaced with the word “action” in this DEIR. Chapter 1 in the environmental document describes the action.

T2-5-4

The proposed regulations are in full compliance with the provisions of the APA, in that they adhere to the requirements regarding authority, reference, clarity, consistency, necessity, and non-duplication. The sale of the Caltrans-owned 710 properties also requires that the state comply with CEQA which are separate provisions to the APA procedures.

T2-5-5

All technical studies will be readily available upon request.

T2-5-6

All references that were used in the environmental document have been identified in Chapter 6. The Los Angeles Times reference can be found at <http://maps.latimes.com/neighborhoods/neighborhood/el-sereno/>.

T2-5-7

Section 1 15126.6(e)(1) of the CEQA Guidelines dictates that an EIR must include a discussion of the “no project” (“no action” for this EIR), alternative and its impact. The discussion of the “no project” alternative allows the public and the decision-makers to assess the effects of approving the project versus the effects of not approving the project.

T2-6-1

Caltrans considers respectful treatment of all members of the community, including residents, agency representatives, business owners/operators, and all other interested parties, to be critical for ensuring that all voices are heard and that all input, opinions, complaints, ideas, and suggestions are carefully considered in the process. Caltrans recognizes and is sensitive to the fact that the SR-710 Surplus Property Sales may affect residents. Caltrans is committed to a collaborative, respectful process that recognizes the importance of each member of the community and the value of their input.

T2-6-2

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184

T2-6-3

All comments received on the Draft EIR, including verbal comments received at the public hearings and written comments (comment cards, letters, emails), and responses to those comments are included in this report and will be made available to the decision-makers and the public prior to any action on the proposed action.

T2-7-1

All comments received on the Draft EIR, including verbal comments received at the public hearings and written comments (comment cards, letters, emails), and responses to those comments are included in this report and will be made available to the decision-makers and the public prior to any action on the proposed action.

It is unclear what the commenter is requesting, this comment does not raise an environmental issue within the context of the CEQA and does not ask any questions regarding the technical analysis in the Draft EIR. Therefore, no response is necessary.

Caltrans is not affiliated with this commentator. Caltrans requests interested parties to do their own due diligence before reaching out to this commentator.

T2-8-1

This comment deals with the SR-710 North Study. Information regarding vibration and settlement can be found at http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/

T2-9-1

Per the 2012 audit, it was found that Caltrans passed up roughly \$22 million in rental income for these properties due to the fact that Caltrans failed to charge rents at the market rate for the majority of the properties. Therefore, Caltrans uses fair market rent determinations for all the properties and adjust the tenants' rents to fair market after providing them with proper notice.

T2-9-2

Caltrans has complied with all requirements of the APA Rulemaking process, including providing all interested parties with an opportunity to submit oral and written comments. Caltrans makes information equally available to people with limited English proficiency in accordance with Title VI of the Civil Rights Act.

T2-9-3

Caltrans maintains a mailing list containing names and addresses of tenants and other stakeholders. Notices of the public hearings were sent to all interested parties whose address is on that mailing list.

Caltrans has complied with all requirements of the APA Rulemaking process, including providing all interested parties with an opportunity to submit oral and written comments. Caltrans makes information equally available to people with limited English proficiency in accordance with Title VI of the Civil Rights Act.

T2-9-4

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the environmental documents be translated into Spanish.

T2-10-1

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the environmental documents be translated into Spanish.

T2-10-2

Please see response to T2-10-1.

T2-10-3

Public notice has been provided on the proposed action in a manner that meets and exceeds the CEQA requirements for public notice on the availability of an EIR. Adequate public notice was provided under the CEQA requirements.

T2-10-4

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the environmental documents be translated into Spanish. Notices about the public hearings were distributed in Spanish and English. Further, Caltrans provided Spanish translation at both public meetings

T2-10-5

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the documents be translated into Spanish. Notices about the public hearings were distributed in Spanish and English. Further, Caltrans provided Spanish translation at both public meetings.

T2-10-6

Please see response to T2-10-5.

T2-11-1

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

T2-11-2

Please see response to T2-11-1.

All technical studies will be readily available upon request.

T2-11-3

CEQA does not require that the documents be translated into Spanish.

T2-11-4

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. Furthermore, Caltrans will not disclose the names of the current tenants and/or current occupants in the 710 properties.

T2-11-5

Caltrans considers respectful treatment of all members of the community, including residents, agency representatives, business owners/operators, and all other interested parties, to be critical for ensuring that all voices are heard and that all input, opinions, complaints, ideas, and suggestions are carefully considered in the process. Caltrans recognizes and is sensitive to the fact that the SR-710 Surplus Property Sales may affect residents. Caltrans is committed to a collaborative, respectful process that recognizes the importance of each member of the community and the value of their input.

T2-11-6

Please see response to T2-11-4.

T2-12-1

The persons displaced as a result of this proposed action will receive relocation assistance program (RAP) benefits through California Government Code Section 54238.3 (Appendix B). Further, the Environmental Commitment Record, located in Appendix E, list minimization measure R-1, that will be implemented to avoid and minimize the number of people displaced. Also, throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790. Questions can also be directed to your rental agent.

T2-12-2

The displacement of 148 households is a mathematical assumption developed by Caltrans for the Standardized Regulatory Impact Assessment (SRIA). Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. Gentrification is a phenomenon felt by both renters and property owners. Renters experience higher rents as property values rise in the area. Over the past fifty (50) years property values in Los Angeles County have risen by approximately 427% **; between January 1960 and September 2015, respectively, values have risen from \$15,900 to \$475,600**. As property values have risen, rents have also increased during this same period, to help offset increased costs and return to investors. Generally rents have risen by approximately 648%** percent during this same period. During this time, the median income has not increased proportionately to increases in property value or rents; median income increasing by approximately 143%** percent between 1960 and 2015. Therefore while housing costs have risen for both renters and investors since the initial acquisition of the 460 properties, rising values have always been a part of the local economy where by Gentrification has become a byproduct and component of a growing economy. Many minorities have achieved higher education, better paying jobs and moving back to the areas they were raised; including El Sereno, South Pasadena and Pasadena. Increased education, access to better paying jobs, renting and investing in your childhood community has also created a positive gentrification; creating stability and pride of ownership, making these areas a better place to reside.

***Source: University of California Los Angeles, University of Southern California, Tierra West Advisors, Inc., California Association of Realtors, Housing and Urban Development, Los Angeles Times. Journalist Resource, Cities, Inequality, Municipal, Race, Cities, Real Estate, Gentrification, urban displacement and affordable housing: Overview and research roundup August 15, 2014*

T2-12-3

Please see response to T2-12-2.

T2-12-4

Caltrans respectfully disagrees with the comment that the Draft EIR failed to comply with CEQA.

With regard to significant effects, Section 4.2.2.3 Significance Criteria in Chapter 4 of the environmental document provides more detailed description of the criteria for determining the significance of impacts related to population and housing.

T2-13-1

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

T2-13-2

Adequate public notice was provided under the CEQA requirements. CEQA does not require the environmental documents be translated into Spanish. Notices about the public hearings were distributed in Spanish and English. Further, Caltrans provided Spanish translation at both public meetings.

T2-14-1

Caltrans public outreach for the Affordable Sales Program effort included the scheduling of Public Hearings on April 20 and April 21. An additional public hearing was then added and took place on May 12. Letters regarding said hearings were sent to all tenants. Notices of the public hearings were published in three newspapers in two languages, and on:

<http://www.dot.ca.gov/dist07/business/710sales/>. Caltrans is currently exploring options to engage outside assistance with homebuyer education. Throughout the sales process, Caltrans will have staff available to assist Affordable Sales Program participants with navigating the process of qualifying for, and purchasing properties. There is also a phone number to call for questions about, and assistance regarding, the Affordable Sales Program: (213) 897-8184. Additionally, there is a link to a "Questions/Comments Form", as well as the most current information regarding the Affordable Sales Program, located at <http://www.dot.ca.gov/dist07/business/710sales/>. For questions regarding the proposed regulations, please call (916) 654-4790.

T2-14-2

Please see response to T2-14-1

T2-14-3

Adequate public notice was provided under the CEQA requirements. CEQA does not require the environmental documents be translated into Spanish.

T2-14-4

Adequate public notice was provided under the CEQA requirements. CEQA does not require the environmental documents be translated into Spanish. Notices about the public hearings were distributed in Spanish and English. Further, Caltrans provided Spanish translation at both public meetings.

T2-14-5

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

Adequate public notice was provided under the CEQA requirements. CEQA does not require the environmental documents be translated into Spanish.

T2-15-1

Government Code Section 54237 provides for the sale of property at Fair Market Value to former owners who are current tenants as well as to those tenants who do not qualify to purchase the property at an affordable price in accordance with the statute. A change would require legislation.

T2-15-2

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184.

T2-15-3

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV.

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

T2-15-4

The DEIR is available for viewing and download at <http://www.dot.ca.gov/dist07/resources/envdocs>. A hard copy of the DEIR was also available for review at Caltrans District 7, Division of Environmental Planning (100S. Main Street, Los Angeles, CA 90012) during public circulation. Additionally, the DEIR was available for review at the following locations during public circulation:

- Civic Center Library, 101 S. 1st St., Alhambra, CA 91801
- San Rafael Library, 1240 Nithsdale Rd., Pasadena, CA 91105
- Pasadena Central Library, 285 E. Walnut St., Pasadena, CA 91101
- El Sereno Library, 5526 Huntington Drive S., Los Angeles, CA 90032
- Allendale Library, 1130 S. Marengo Ave., Pasadena, CA 91106
- South Pasadena Library, 1100 Oxley St., S.Pasadena, CA 91030

Government Code Section 54237 provides for the sale of property at Fair Market Value to former owners who are current tenants as well as to those tenants who do not qualify to purchase the property at an affordable price in accordance with the statute. A change would require legislation.

T2-16-1

Questions regarding management of the 710 properties should be directed to District 7 Property Services at (213) 897-8184

T2-16-2

Public notice has been provided on the proposed action in a manner that meets and exceeds the CEQA requirements for public notice on the availability of an EIR. Adequate public notice was provided under the CEQA requirements.

T2-17-1

Caltrans has complied with all requirements of the CEQA process, including providing all interested parties with an opportunity to submit oral and written comments.

T2-17-2

Government Code Section 54236(h) dictates that the Department use median income as published by the United States Department of Housing and Urban Development (HUD) as implemented by Health and Safety Code Section 50093.

T2-17-3

No technical reports are mandated by state or federal law. If impacts to the community are anticipated, they must be identified and discussed within the body of the Environmental Document. DRIR is a technical report. The DRIR conclusions are summarized in the DEIR. Therefore, the DRIR was completed before the DEIR. With regard to the potential 148 households displaced not analyzed in the DEIR, please refer to Section 4.2.2 in Chapter 4 of the DEIR which summarizes the findings of the DRIR and CIA.

T2-17-4

This comment deals with the potentially 148 households displaced that would result from current occupants and/ or tenants not qualifying or being interested in purchasing the surplus properties. The displacement of 148 households is a mathematical assumption developed by Caltrans. Detailed data is not available on each resident to define an accurate number of potential households being displaced. Consequently, Caltrans has estimated 148 in order to provide an estimate and address the number of households that may potentially be impacted by the sale of these 460 properties. As stated in The Standardized Regulatory Impact Assessment (SRIA) (Appendix H of the DEIR), it is assumed that 100 properties will sell at an affordable price (assume approximately half of the properties will be offered at an affordable price and approximately half of those will sell at an affordable price). There are a total of 41 multi-family homes that are assumed to be sold to Housing Related Entities (HREs) at a reasonable price. It is anticipated HREs will purchase 45 single family homes that are not desired by current tenants. It is also assumed that the remaining properties will sell at Fair Market Value (FMV). Per the 2012 audit: $398 - 100 - 41 - 45 = 212$ single family properties. Of these 212, approximately 30% of the remaining FMV homes will sell to current tenants which will use the double escrow = 64 homes. Therefore, $212 - 64 = 148$ properties/households will have their initial sale at FMV

T2-17-5

With regard to the potential 148 households displaced not analyzed in the DEIR, please refer to Section 4.2.2 in Chapter 4 of the DEIR which summarizes the findings of the DRIR and CIA.

T2-17-6

Caltrans has completed the DEIR per CEQA requirements.

Caltrans adopted Excess Real Property Regulations to implement Streets and Highways Code 118 in February 2015.

T2-17-7

Caltrans has completed the DEIR per CEQA requirements, and has included all sales, not only properties subject to the ASP.

Unimproved property not sold to current tenants will be offered for sale pursuant to Streets and Highways Code Section 118.6 which allows properties to be offered at auction to the public, or by sale or exchange to public agencies.

T2-18-1

Government Code Section 54237.7 allocates the proceeds of sales made by the Department for the purposes of providing repairs to properties sold at an affordable price, pursuant to Section 54237(b), and for certain transportation-related projects in the geographic area described as "Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and that portion of Los Angeles within the 90032 ZIP Code." That description defines the geographical limits on the use of sale proceeds.

T2-18-2

Maps of the proposed alternatives for the SR-710 North Study can be found at http://www.dot.ca.gov/dist07/resources/envdocs/docs/710study/draft_eir-eis/ under Project Alternative Maps

T2-18-3

The Los Angeles City Council Resolution (2012) which can be found at http://clkrep.lacity.org/onlinedocs/2012/12-0002-S82_CA_08-28-12.pdf does not prohibit construction beneath the City of Los Angeles. The resolution opposes the proposed extension of the North Long Beach 710 Freeway and any above ground highway or freeway that would cut through the City of Los Angeles. The resolution will not affect the sale of the surplus properties.

T2-19-1

Public circulation for the DEIR ended on September 8 2015, extended from August 24, 2015. For a total of 60 days.

T2-19-2

Adequate public notice was provided under the CEQA requirements. CEQA does not require that the documents be translated into Spanish.

T2-19-3

CEQA does not require that a public hearing be held as part of the public review period (CEQA Guidelines §15087); however, Caltrans held two public hearings on the proposed action on August 6, 2015 and August 10, 2015. Caltrans provided Spanish translation at both public meetings.

Appendix E Environmental Commitment Record

Environmental Commitment Record

SR-710 Surplus Property Sales

Log No.	Task	Responsible Party	Action Timing/Phase	Brief Description	Action to Comply	Date Task Completed	Completed Signature Page
Land Use							
LU-1	Local Plan Consistency (applies to Alt. 1) ¹	Caltrans and affected local agencies	Selection of Preferred Alternative	Alternative 1 would result in inconsistencies with local jurisdictions' General Plans and/or other location land use plans. Under Alternative 1, the California Department of Transportation (Caltrans) will request applicable local jurisdictions to amend their General Plans and/or other local land use plans to reflect that the surplus properties would not be sold. However, because Caltrans has no authority to require a General Plan amendment, a significant unavoidable impact would remain until the General Plans are amended.			
Relocations							
R-1	Relocations (applies to Alt. 2)	Caltrans Division of Right-of-Way	During Sale Process	To increase the potential for occupants to obtain financing to purchase, and thereby avoid and minimize the number of people displaced, the California Department of Transportation (Caltrans) is working with the California Housing Finance Agency to make more financing products available to prospective buyers than are currently readily available in the general lending market. Occupants who do not purchase will be provided advisory assistance to find and relocate to comparable housing, and Caltrans will seek assistance from agencies such as the United States Department of Housing and Urban Development (HUD) to find affordable housing.			

Environmental Commitment Record
SR-710 Surplus Property Sales

Log No.	Task	Responsible Party	Action Timing/ Phase	Brief Description	Action to Comply	Date Task Completed	Completed Signature Page
Cultural Resources							
CR-1	Historic Resources (applies to Alt. 2)	Caltrans Division of Environmental Planning - Cultural Specialist, various preservation organizations and agencies	Prior to Sale	Consultation with responsible historic preservation organizations, subject local agencies, and the State Historic Preservation Officer (SHPO) will result in the development of historic covenants or other agreements to protect the historic character and significant features of the National Register of Historic Places (National Register) listed or determined eligible for listing properties. These protective measures will be executed and filed appropriately as the properties are sold and new owners are identified. Agreements to protect historical resources will be enforceable by way of third-party monitoring by a non-profit organization. Any potential impacts to cultural resources would be avoided under these protective measures, which will be held in perpetuity.			
CR-2	Historic Resources (applies to Alt. 2)	Caltrans Division of Environmental Planning – Cultural Specialist, various preservation organizations and agencies	During Sale Process/After Sale	The California Department of Transportation (Caltrans) will provide a one-time monetary payment, a stewardship fee, to ensure that the qualified organization will have the financial support for the continued monitoring of the historic covenants or other protective measures as agreed.			

Environmental Commitment Record

SR-710 Surplus Property Sales

Log No.	Task	Responsible Party	Action Timing/Phase	Brief Description	Action to Comply	Date Task Completed	Completed Signature Page
Hazardous Waste and Materials							
HW-1	Remediation (applies to Alt. 2) ¹	Caltrans Hazardous Waste Branch	Prior to sale	A qualified contractor will conduct Initial Site Assessment (ISA) investigations at Parcel Nos. 14135 and 61314 prior to their being sold. Further testing (Phase II Environmental Site Assessment) may be required based on the findings of the ISA, but the parcels will be held until further investigation and testing can be completed and, if necessary, remediation/mitigation can occur.			
HW-2	Lead Awareness (applies to Alt. 2)	Caltrans Division of Right-of-Way	Prior to sale	Each buyer will receive a pamphlet entitled "Protect Your Family From Lead In Your Home" and be required to sign a Disclosure of Information on Lead-Based Paint and Lead-Based Paint Hazards Form.			

¹ Mitigation for significant impacts under CEQA.
 Alt. = Alternative
 Caltrans = California Department of Transportation
 HUD = United States Department of Housing and Urban Development
 ISA = Initial Site Assessment
 SHPO = State Historic Preservation Officer

Appendix F Affordable Sales Program Regulations

This page intentionally left blank

TITLE 21 PUBLIC WORKS
DIVISION 2. DEPARTMENT OF
TRANSPORTATION CHAPTER 9.5.
AFFORDABLE SALES PROGRAM

§ 1475 Purpose and Scope

- (a) In 1979, the Legislature passed and the Governor did sign Senate Bill 86, subsequently amended, most recently by Senate Bill 416, and collectively known as the “Roberti Act,” which added Sections 54235 through 54238.7 to the Government Code (the Act) wherein the Legislature has found and declared that the sale of certain surplus residential properties by the Department of Transportation (the Department) would directly serve an important public purpose. The Legislature intended by passage of the Act to dispose of such surplus residential properties in a manner that will - preserve, upgrade and expand the supply of housing available to affected persons and families of low or moderate-income. The Legislature further intended the Act to mitigate the environmental effects, within the meaning of Article XIX of the California Constitution, caused by certain highway activities related to such surplus residential properties.
- (b) This chapter sets forth the regulations used by the Department for the sale of surplus residential properties and nonresidential properties pursuant to the Act for State Route 710 (SR 710), in Los Angeles County. The regulations specified herein and the governing statutes are collectively known as the “Affordable Sales Program.”

NOTE: Authority cited: Govt. Code §§ 54235, 54237, 54238.3, 54238.4, Sts. & Hy. Code § 118.6. Reference cited: Cal. Const. Art. XIX; Govt. Code §§ 54235, 54238.3 & 54238.4.

§1476 Definitions

- (a) “Affordable housing cost” shall be calculated in a manner consistent with the provisions of Health and Safety Code section 50052.5 as implemented by California Code of Regulations, Title 25, section 6924. For purposes of this chapter, “affordable housing cost” shall not exceed the following:
- (1) With respect to lower income households, housing costs up to 25 percent of gross income;
 - (2) With respect to moderate income households, housing costs up to 30 percent of gross income;
 - (3) With respect to households whose gross income is above low or

moderate income but does not exceed 150 percent of the area median income, housing costs up to 30 percent of gross income.

- (b) **“Affordable price”** means the maximum price at which the housing cost to be paid by the prospective buyer would not exceed the affordable housing costs for such buyers while applying the market interest rate over a fully amortized 30-year term. In the case of a buyer that is a lower income household, the price for residential property shall not be greater than the amount that would result in the buyer’s monthly payments exceeding that portion of the buyer’s household adjusted income, as determined in accordance with the regulations of the United States Department of Housing and Urban Development issued pursuant to Section 8 of the United States Housing Act of 1937. The affordable price shall not be less than the price paid by the agency for original acquisition, unless the acquisition price was greater than the current fair market value, and shall not be greater than fair market value.
- (c) **“Affordable rent”** means rent calculated in a manner consistent with the provisions of Government Code section 54236 (g) and California Code of Regulations, Title 25, section 6922.
- (d) **“Area median income”** shall have the same definition as set forth in Health and Safety Code, section 50093.
- (e) **“CalHFA”** means the California Housing Finance Agency, a public instrumentality and political subdivision of the State of California created by the Zenovich-Moscone-Chacon Housing and Home Finance Act, division 31 of the California Health and Safety Code.
- (f) **“Conditional Offer Prior to Sale”** means the manner in which all surplus residential property is offered for sale in accordance with this chapter.
- (g) **“Designated housing-related public entity”** means a housing-related public entity designated by the legislative body of the city in which a surplus residential property is located. Such designation shall be made by the legislative body pursuant to resolution and sent to the Department within the time frames set forth in this chapter.
- (h) **“Date the offer of sale is made”** means the date stated in the Conditional Offer Prior to Sale or publication, as applicable.
- (i) **“Decent, Safe, and Sanitary”** means the condition of a replacement dwelling as defined and described in California Code of Regulations, Title 2, section 1872.
- (j) **“Department approved appraised fair market value”** means the fair market value as determined by a licensed appraiser, and reviewed and accepted by the Department to be compliant with the Uniform Standards of Professional Appraisal Practice.
- (k) **“Displaced”** means a condition when a person is subject to displacement pursuant to Government Code section 54236(e) or 54238.3(b).

(l) **“Fair market value”** means the most probable price which a property should bring in a competitive and open market under all conditions requisite to a fair sale in accordance with Government Code section 54236(f), the buyer and seller each acting prudently and knowledgeably, and assuming the price is not affected by undue stimulus. Implicit in this definition is the consummation of a sale as of a specified date and the passing of title from seller to buyer under conditions whereby:

- (1) The buyer and seller are typically motivated;
- (2) Both parties are well informed or well advised, and each is acting in what they consider their best interest;
- (3) A reasonable time is allowed for exposure in the open market;
- (4) Payment is made in terms of cash in United States Dollars or in terms of a financial arrangement comparable thereto;
- (5) The price represents the normal consideration for the property sold unaffected by special or creative financing, sales concessions, or the use and resale restrictions; and

For transfer from the Department, the date of value is the date the offer of sale is made by the selling agency.

(m) **“Forced to relocate”** means a condition when a displaced person has vacated the surplus residential property not later than ninety (90) days after transfer from the Department to a new owner pursuant to a legal written notice to vacate, excluding notices for cause.

(n) **“Former tenants in good standing”** means tenants who were current in rent obligations, in full compliance with the terms and conditions of the lease or rental agreement at the time of vacancy, and whose tenancy was not terminated for cause.

(o) **“Good standing”** means a condition when tenants or occupants who are current in rent obligations, and in full compliance with the terms and conditions of the lease or rental agreement as of the date the tenant or occupant responds to the Conditional Offer Prior to Sale and at time of transfer from the Department.

(p) **“Housing cost”** of a prospective buyer purchasing a surplus residential property shall be calculated in accordance with the provisions of California Code of Regulations, Title 25, section 6920.

(q) **“Housing-related private entity”** means any individual, joint venture, partnership, limited partnership, trust, corporation, cooperative, or other legal entity, or any combination thereof, approved by the Department as qualified to either own, construct, acquire, or rehabilitate a housing development, or a residential structure other than an owner-occupied single unit whether for profit, non-profit, or limited profit.

(r) **“Housing-related public entity”** means any county, city, city and county, the duly constituted governing body of an Indian reservation or Rancheria, or housing authority organized pursuant to the Health and Safety Code, division 24, part 2, chapter 1, and also includes any state agency, public district or other political subdivision of the state, and any instrumentality thereof, which is authorized to engage in or assist in the development or operation of housing for persons or families of low or moderate income. Housing-related public entity also includes two or more housing-related public entities acting jointly.

(s) **“Limited equity cooperative housing”** means a corporation as defined in Civil Code section 817.

(t) **“Minimum Property Standards”** means meeting the following minimum acceptable criteria for existing surplus residential properties.

(1) Real Estate Entity. The property must comprise a single readily marketable real estate entity.

(2) Party or Lot Line Wall. A building constructed on or to a property line must be separated from the adjoining building, by a wall extending the full height of the building from the foundation to the ridge of the roof. The wall can separate row type townhouses or semi-detached units. There must be adequate space between buildings to permit maintenance of the exterior walls.

(3) Service and Facilities.

(i) Trespass. Each living unit must be able to be used and maintained individually without trespass upon adjoining properties. Any easement required must run with the land.

(ii) Utilities must be independent for each living unit except that common services, such as water, sewer, gas and electricity, may be provided for living units under a single mortgage or ownership. Separate utility service shut-off for each unit shall be provided. For living units under separate ownership, common utility services may be provided from the main to the building line when protected by easement or covenant and maintenance agreement acceptable to the Department. Individual utilities serving a living unit shall not pass over, under, or through another living unit, unless provision is made for repair and maintenance of utilities without trespass on adjoining properties or legal provision is made for permanent right of access for maintenance and repair of utilities.

(iii) Other facilities must be independent for each living unit, except that common services, such as laundry and storage space or heating, may be provided for in two-to-four living unit buildings

- under a single mortgage.
- (4) Each living unit must contain the following:
- (i) A continuing supply of safe and potable water.
 - (ii) Sanitary facilities and a safe method of sewage disposal.
 - (iii) Heating adequate for healthful and comfortable living conditions. The Department may determine that climatic conditions are such that mechanical heating is not required. Dwellings with wood burning stoves or solar systems used as a primary heat source must have permanently installed conventional heating systems that maintain at least 50 degrees Fahrenheit in areas containing plumbing systems.
 - (iv) Domestic hot water.
 - (v) Electricity for lighting and for equipment used in the living unit.
- (5) Access.
- (i) Each property must be provided with a safe and adequate pedestrian or vehicular access from a public or private street.
 - (ii) All streets must have an all-weather surface.
 - (iii) Access to the living unit must be provided without passing through any other living unit.
 - (iv) Access to the rear yard must be provided without passing through any other living unit. For a row-type dwelling, the access may be by means of alley, easement, passage through the dwelling, or other acceptable means.
- (6) Defective Conditions. Defective construction, poor workmanship, evidence of continuing settlement, excessive dampness, leakage, decay, termites, or other conditions impairing the safety, sanitation or structural soundness of the defects or conditions have been remedied and the probability of further damage eliminated.
- (7) Space Requirements. Each living unit must be provided with space necessary to assure suitable living, sleeping, cooking and dining accommodations and sanitary facilities.
- (8) Mechanical systems must be safe to operate, be protected from destructive elements, have reasonable future utility, durability and economy, and have adequate capacity and quality.
- (9) Ventilation. Natural ventilation of structural space such as attics and crawl spaces, must be provided to reduce the effect of conditions of excess heat and moisture which are conducive to decay and deterioration of the structure.
- (10) Roof covering must prevent entrance of moisture and provide reasonable future utility, durability and economy of maintenance. When reroofing is

needed for a defective roof, already consisting of three layers of shingles, all old shingles must be removed prior to re-roofing.

(11) Hazards. The property must be free of hazards which may adversely affect the health and safety of the occupants or the structural soundness of the improvements, or which may impair the customary use and enjoyment of the property by the occupants. The hazards can be subsidence, flood, erosion, defective lead base paint (24 CFR Part 35) or the like.

(12) Crawl Space

(i) Must be adequate access to the crawl space.

(ii) The floor joists must be sufficiently above the highest level of the ground to provide access for maintenance and repair of ductwork and plumbing.

(iii) The crawl space must be clear of all debris and properly vented.

(iv) Any excessive dampness or ponding of water in the crawl space must be corrected.

(13) Drainage. The site must be graded so as to provide positive, rapid drainage away from the perimeter walls of the dwelling and prevent ponding of water on the site.

(u) “Multifamily property” means property that consists of two or more dwelling units.

(v) “Nonresidential Property” means property, whether improved or unimproved, that is

used primarily for a nonresidential purpose that is fully compliant, properly permitted, and licensed under local ordinances and state licensing requirements as of the effective date of these regulations if applicable.

(w) “Occupant” notwithstanding any other provision of law, means a person or persons who lives in the surplus residential property as their principal place of residence, is of majority age, and is listed on the lease or rental agreement prior to the date a prospective buyer responds to a Conditional Offer Prior to Sale.

(x) “Persons or families of low or moderate income” shall have the same meaning as set forth in Health and Safety Code section 50093.

(y) “Principal place of residence” means the place where one actually lives for the greater part of time, or the place where one remains when not called elsewhere for some special or temporary purpose and to which one returns frequently and periodically, as from work or vacation. There may be only one principal place of residence for any individual. Evidence that a location is the individual's "principal place of residence" includes, but is not limited to, the following elements, a compilation of which lends greater credibility to the determination

that a particular place is the principal place of residence, whereas the presence of only one element may not support such a determination:

(1) The subject premises are listed as the individual's place of residence on any motor vehicle registration, driver's license, voter registration, or with any other public agency, including federal, state and local taxing authorities.

(2) Utilities are billed to and paid by the individual at the subject premises.

(3) All of the individual's personal possessions have been moved into the subject premises.

(4) A homeowner's tax exemption for the individual has not been filed for a different property.

(5) The subject premises are the place the individual normally returns to as his/her home, exclusive of military service, hospitalization, vacation, family emergency, travel necessitated by employment or education, or other reasonable temporary periods of absence.

(z) “Prospective buyer” means an occupant who lives in the surplus residential property as their principal place of residence for at least ninety (90) days prior to the date the property was declared surplus and who shall occupy the surplus residential property as their principal place of residence after transfer by the Department.

(aa) “Reasonable price” means the price which is best suited to the economically feasible use of the property as decent, safe, and sanitary housing at affordable rents and affordable prices established by the entity in accordance with section 1478(c).

(bb) “Surplus residential property” means land and structures owned by the Department determined to be excess pursuant to Streets and Highways Code section 118.6, and determined to be no longer necessary for the Department’s use, and that are developed as single-family or multifamily housing, but does not include property being held by the Department for the purpose of exchange.

(cc) “Transfer” means any sale, assignment, or conveyance, voluntary or involuntary, of any interest in the property. Without limiting the generality of the foregoing, transfer shall include (i) a transfer by devise, inheritance or intestacy to a party who does not meet the definition of persons or families of low or moderate income, (ii) a lease or occupancy agreement of all or any portion of the property unless due to hardship or otherwise approved by the Department, (iii) creation of a life estate, (iv) creation of a joint tenancy interest, (v) execution of a land sale contract by which possession of the property is transferred to another party and title remain in the transferor, (vi) a gift of all or any portion of the property, or (vii) any voluntary conveyance of the property. Transfer shall not include conveyance by devise, inheritance, or intestacy to a spouse, a conveyance to a spouse pursuant to the right of survivorship under a joint tenancy, conveyance to a revocable trust, or a

conveyance to a spouse in a dissolution proceeding, however, any subsequent conveyance shall be subject to the use and resale restrictions.

(dd) “Tenure” means the longest uninterrupted term of occupancy attributable to each prospective buyer.

(ee) “Use and resale restrictions” means any and all terms, conditions and restrictions recorded against the surplus residential property or otherwise made pursuant to this chapter and which shall be enforceable pursuant to the Act and this chapter.

NOTE: Authority cited: Govt. Code §§ 54235, 54236, 54237, 54237.5, 54238, 54238.3, 54238.4, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code §§ 54236, 54237, 54238; Sts. & Hy. Code § 118.6; 24 C.F.R. § 5.100; Health & Saf. Code § 50076.5; 25 CFR 700.55; Health & Saf. Code §§ 34240, 50052.5, 50079.5, 50093 & 50900; Civ. Code § 817.

§1477 Conditional Offer Prior to Sale

- (a) In making offers to sell surplus residential property, the Department shall determine the order of priority and condition such offers as follows:
- (1) All single-family residences presently occupied by their former owners shall be offered to those former owners at the Department approved appraised fair market value.
 - (2) All single-family residences shall be offered at an affordable price or Department approved appraised fair market value at each prospective buyer’s option to the occupants, on condition occupants: (i) have occupied the surplus residential property as their principal place of residence two years or more, (ii) are persons or families of low or moderate income, and (iii) have not had an ownership interest in real property in the last three years as of the date notice is provided under section 1485(a).
 - (3) All single-family residences shall be offered at an affordable price or Department approved appraised fair market value at each prospective buyer’s option to the occupants, on condition occupants: (i) have occupied the surplus residential property as their principal place of residence five years or more, (ii) have household gross income that is above moderate income but does not exceed 150 percent of the area median income adjusted for family size, and (iii) have not had an ownership interest in real property in the last three years as of the date notice is provided under section 1485(a).

- (4) All other surplus residential properties and all properties described in paragraphs (1), (2), or (3) of this subparagraph (a) that are not purchased by the former owners or the occupants, shall then be offered at a reasonable price to and in the following order of priority: (i) if it is feasible, then the surplus residential property shall be offered to prospective housing-related private and public entities on condition that the purchasing entity cause the surplus residential property to be rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives in accordance with Civil Code section 817, with first right of occupancy to current tenants, (ii) if it is not feasible to sell the surplus residential property to prospective housing-related private or public entities on condition that the purchasing entity cause the surplus residential property to be rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives in accordance with Civil Code section 817, then the surplus residential property shall be offered to a housing-related public entity as designated by the legislative body of the city in which the surplus residential property is located (the “designated housing-related public entity”), with first right of occupancy to current tenants, (iii) to any housing-related private or public entity on condition the purchasing entity shall cause the surplus residential property to be used for low and moderate income rental or owner-occupied housing in accordance with this chapter, with first right of occupancy to the current tenants. Feasible, as used in this section, means the ability or capacity to form a cooperative or cooperatives based on a commercially reasonable market analysis paid for by the prospective housing-related private or public entity. Factors considered shall include, but not be limited to, the geographic location, number of units, tenant interest, available resources for continued operation, and availability of financing as determined by the Department.
- (5) Any surplus residential properties not sold pursuant to subparagraphs (1) to (4), inclusive, shall then be sold at fair market value to and in the following order of priority: (i) to current tenants in good standing who intend to be owner occupants, (ii) to former tenants in good standing who intend to be owner occupants, with priority given to the most recent tenants first, (iii) pursuant to Streets and Highways Code section 118, with preference given to the highest responsive bidder who will be an owner occupant.

- (b) All surplus residential properties offered to current tenants in good standing shall be made to all such current tenants shown on the existing lease or rental agreement for purchase in the entirety.
- (c) All surplus residential properties offered to former tenants in good standing shall be made to all such former tenants in good standing shown on the most recent lease, rental agreement or other documentation reasonably approved by the Department for purchase in the entirety.
- (d) The Department may solicit bids and proposals from housing-related private and public entities for such prospective sales described in this section.
- (e) All nonresidential property shall be offered at fair market value to current tenants in good standing, then to any other buyer pursuant to Streets and Highways Code section 118.
- (f) Purchase funds must come from sources other than the Department; the Department will not lend or otherwise finance purchases of the surplus property.
- (g) All surplus residential and nonresidential properties sold are without warranty.

NOTE: Authority cited: Govt. Code §§ 54235, 54236, 54237, 54237.3, 54237.5, 54238.3, 54238.4, 54238.5, 54238.6, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code §§ 54237 & 54237.3, Civ. Code § 817; Sts. & Hy. Code § 118.

§1478 Conditions of Conditional Offer Prior to Sale

- (a) For all surplus residential property offered at fair market value, the following conditions shall apply:
 - (1) The sales price shall be determined by a Department approved appraisal of fair market value.
- (b) For all single-family surplus residential property offered at an affordable price, the following conditions shall apply:
 - (1) The sales price shall be determined in an amount and under such terms that results in an affordable housing cost to the prospective buyer.
 - (2) The Department shall verify tenure, income, real property ownership interest, and household size for prospective buyers.
 - (3) Pursuant to subdivision (b) of section 54237 of the Government Code, the Department shall provide necessary repairs limited to the Minimum Property Standards and reasonable lender required repairs identified pursuant to a written inspection report prepared in accordance with Section 1996, Title 16, of the California Code of

Regulations provided however the Department may offer a single-family surplus residential property in an “as is” condition at the request of a prospective buyer given priority to purchase such surplus residential property at an affordable price.

(4) Notwithstanding the requirement to provide repairs in subdivision (b) of section 54237 of the Government Code, the Department may elect to offer a replacement dwelling in lieu of the property that would have otherwise been offered to a prospective buyer, pursuant to Government Code section 54237.5. In such event, the sales price for the replacement dwelling shall be determined under the same terms and conditions set forth in this section, including the recordation of the use and resale restrictions, and the surplus residential property shall then be sold at an affordable price.

(5) There shall be use and resale restrictions commencing from the date of transfer from the Department in accordance with Government Code section 54237(b). Such restrictions shall include, but are not limited to, a prohibition against renting the subject property, with the exception that a buyer purchasing at an affordable price may rent to persons or families of low or moderate income at an affordable rent, not to exceed buyer’s affordable housing cost at the time of purchase if the buyer is forced to relocate temporarily because of hardship beyond the control of the buyer. A finding of hardship shall include, but is not limited to: loss of work, personal health problems or health problems of an immediate family member, or divorce. In no case shall rental of the property exceed a total of twelve (12) months measured over any consecutive sixty (60) month period for the time the property is considered affordable.

(6) Any transfer of the surplus residential property within the first year after transfer shall give rise to the presumption that the buyer did not intend to make the surplus residential property the individual’s principal place of residence. In the event the buyer cannot overcome such presumption, then such transfer shall be deemed a default under the use and resale restrictions and the Department may take such action to enforce its rights including those under section 1488.

(7) In no event shall the affordable sales price be less than the original acquisition price paid by the Department.

(c) For all surplus residential properties offered at a reasonable price, the following priorities and conditions shall apply:

- (1) If to housing-related private and public entities on condition that the purchasing entity shall cause the surplus residential property to be rehabilitated and developed as a limited equity cooperative housing cooperative or cooperatives in accordance with Civil Code section 817, then the sales price shall be the price which is best suited to the economically feasible use of the surplus residential property as decent, safe, and sanitary housing at affordable rents and affordable prices as established by the entity, in accordance with this chapter, for persons or families of low or moderate income, and households whose gross income exceeds the maximum income for moderate income households but does not exceed 150 percent of area median income adjusted for family size, with first right of occupancy to current tenants.
- (2) If to a housing-related private or public entity other than as described in (c)(1), then the sales price shall be the price which is best suited to the economically feasible use of the property as decent, safe, and sanitary housing at affordable rents and affordable prices as established by the entity, in accordance with this chapter, for persons or families of low or moderate income and households whose gross income exceeds the maximum income for moderate income households but does not exceed 150 percent of the area median income adjusted for family size, on condition said entity shall first offer to sell the surplus residential property within the same time frames imposed by this chapter for sales made by the Department, at fair market value to present tenants in good standing who intend to be owner occupants. In the event such tenants elect not to purchase the surplus residential property within such time frames, the entity shall cause the surplus residential property to be used as decent, safe, and sanitary housing at affordable rents for persons or families of low or moderate income, and households whose gross income exceeds the maximum income for moderate income households but does not exceed 150 percent of the area median income adjusted for family size with first right of occupancy to present tenants at (i) affordable rents in accordance with this section or (ii) fair market rents in the event such tenants do not qualify at affordable rents.
- (3) In order to ensure that the surplus residential property will remain available to persons or families of low or moderate income, and households whose gross income exceeds the maximum income for moderate income households but does not exceed 150 percent of area median income adjusted for family size there shall be use and resale restrictions commencing from the date of transfer from the Department limiting occupancy to persons or families of low or moderate income,

and households whose gross income exceeds the maximum income for moderate income households but does not exceed 150 percent of area median income adjusted for family size, and the subsequent sale of the surplus residential property in accordance with Government Code section 54237(d).

(4) Any transfer of the surplus residential property within the first year after transfer to a housing-related private or public entity shall give rise to the presumption that such entity did not intend to use the surplus residential property in accordance with either subsections (c) (1) or (c) (2) above. In the event such entity cannot overcome such presumption, then such transfer shall be deemed a default under the use and resale restrictions and the Department may take such action to enforce its rights including those under section 1488.

(5) In no event shall the reasonable sales price be less than the original acquisition price paid by the Department.

(d) Notwithstanding the restriction limiting occupancy and the subsequent sale of the surplus residential property in accordance with Government Code sections 54237(b) and (d), a buyer of surplus residential property may elect to resell the surplus residential property at fair market value during the term of the use and resale restrictions subject to the following:

(1) Upon subsequent sale, the seller shall pay the CalHFA, any net proceeds, which shall be equal to any net equity as defined in subdivision (d) (2) of this section, and the proportionate share of net appreciation, as defined in subdivision (d) (3) of this section; provided, however, in the event the seller is a private or public housing-related entity, such net proceeds shall be paid as follows:

(A) Any net equity as defined in subparagraph (2) shall be evenly divided and paid to the CalHFA and the entity.

(B) Any net appreciation as defined in subparagraph (3), shall be divided as set forth in subparagraph (4) and paid to the CalHFA and the entity.

(C) All net proceeds paid to housing-related entities shall be used to preserve, upgrade and expand the supply of affordable housing exclusively in the Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and the 90032 ZIP code unless otherwise restricted to a particular city in accordance with state law. Housing-related private entities will be monitored at least annually to ensure compliance with this section.

(2) For purposes of this chapter, the net equity shall be equal to the Department approved appraised fair market value of the surplus

residential property at the time of initial sale, minus the initial sale price to the buyer pursuant to Government Code section 54237. If upon resale, the appraised fair market value is lower than the Department approved appraised fair market value of the property without the use and resale restrictions, the value at the time of the resale shall be used as the Department approved appraised fair market value.

(3) For purposes of this chapter, “net appreciation” means the difference between the sales price upon resale and the sum of the following deductions:

(A) Any net equity as defined in subdivision (d) (2) of this section;

(B) The remaining principal loan balance on all financing previously approved by the Department on the property;

(C) All actual closing costs paid by the seller when the property is sold (i.e., escrow, title, broker’s fee, real estate commissions); (D) The owner’s down payment, if any; and

(D) Any costs of improvements for which the Department determines, in its good faith discretion that such costs of improvements were reasonable and resulted in a higher fair market value of the property.

(4) For purposes of this chapter, the CalHFA’s proportionate share of net appreciation shall be equal to one hundred percent (100%) through the end of the first year. Beginning in the second year, the CalHFA’s proportionate share of net appreciation shall be reduced by twenty percent (20%) each year to zero percent (0%). At the completion of five (5) years, the CalHFA shall no longer be entitled to any net appreciation.

(5) The owner may refinance a loan on the surplus residential property provided that any net cash proceeds derived from such refinancing shall be limited to an amount equal to the current appreciation, if any, over and above the net equity to which the CalHFA is entitled under this subparagraph (d). Such proceeds shall be further divided between the owner and the CalHFA based upon the current proportionate share of net appreciation as set forth in subparagraph (d) (4).

(6) The provisions of this section shall be set forth in the use and resale restrictions and shall not be subject to subordination.

(e) Upon the occurrence of the earlier of the termination of the use and resale restrictions or resale at fair market value, the Department shall execute and record a full conveyance of its rights to the surplus residential property in the manner required pursuant to Civil Code section 2941.

NOTE: Authority cited: Govt. Code §§ 54235, 54236, 54237, 54238, 54238.3, 54238.4, Sts. & Hy. Code § 118.6. Reference cited: 24 C.F.R. § 200.926; Govt.

Code §§ 54237 & 54237.3; Civ. Code §§ 817, 2941; Sts. & Hy. Code §§ 104.5 & 118.

§1479 Notice of Conditional Offer Prior to Sale

- (a) The Department shall give written notice of the Conditional Offer Prior to Sale by certified mail, to each occupant, and to each former tenant at the last address known to the Department for single-family surplus residential properties pursuant to section 1477.
- (b) All other offers required by section 1477 shall be made by publishing the notice in at least one newspaper of general circulation within the city or county in which the surplus residential property is located, pursuant to Government Code section 6061.3.

NOTE: Authority cited: Govt. Code §§ 54235, 54238.3, 54238.4, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code §§ 6061.3, 54237.

§1480 Term of Conditional Offer Prior to Sale

- (a) The Conditional Offer Prior to Sale delivered by certified mail shall remain open for one hundred twenty (120) calendar days from the postmarked date of mailing. The Conditional Offer Prior to Sale made pursuant to published notice shall remain open for one hundred twenty (120) calendar days from the final date of publication pursuant to Government Code section 6061.3.

NOTE: Authority cited: Govt. Code §§ 54235, 54237, 54238.3, 54238.4, 54238.5, 54238.6, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code § 6061.3, 54237.

§1481 Acceptance of Conditional Offer Prior to Sale

- (a) Acceptance of the Conditional Offer Prior to Sale must be made in writing to the Department, mailed by certified mail, (return receipt requested), to the address identified in the Conditional Offer Prior to Sale and postmarked no later than one hundred twenty (120) calendar days from the postmarked date of mailing of the notice of Conditional Offer Prior to Sale or the final date of publication, as applicable.

NOTE: Authority cited: Govt. Code §§ 54235, 54237, 54238.3, 54238.4, 54238.5, 54238.6, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code § 54237.

§1482 Acceptance Must Include Evidence of Eligibility to Purchase; Burden on Prospective Buyer

- (a) The burden is on the prospective buyer to show eligibility for purchase at an affordable price.
- (b) Acceptance of the Conditional Offer Prior to Sale by the prospective buyer for purchase at an affordable price must include evidence of income, tenure, real property ownership interest, and household size.
- (1) The prospective buyer shall provide documentation of household income. Income from all occupants 18 years of age or older as of the date of acceptance of Conditional Offer Prior to Sale shall be included as part of household income for the period of time stated in Government Code section 54237(a), paragraphs (2) and (3). Income documentation shall include federal income tax returns with schedules. Current tax year documentation must be sufficient to fully state household income as of the date of acceptance of the Conditional Offer Prior to Sale and shall include, but is not limited to: pay stubs; signed letters from employers; documents stating foreign income; profit and loss statements; bond and stock dividend statements; retirement, Survivors Disability Insurance, Social Security Retirement, and Social Security Disability Insurance benefits; pension and annuity income; unemployment compensation; education scholarships, awards, fellowship grants used for living expenses; gift income; alimony received and court awards; income from rental property, including room rental; and tips. Income documentation shall be provided for each and every occupant 18 years of age or older as of the date of acceptance of the Conditional Offer Prior to Sale. All documentation offered to show income is subject to verification by the Department.
- (2) The prospective buyer shall provide documentation of tenure for the period of time stated in Government Code section 54237(a), paragraphs (2) and (3). Such documentation must be of sufficient reliability, in its totality, to support a prospective buyer's claim of tenure. Such documentation may include, but is not limited to: rental or lease agreements; utility bills; school documents, medical documents, employment documents, faith-based documents that include the name and address of the issuing organization; federal and state tax returns; vehicle registrations; drivers licenses and identification cards; change of address confirmations by the United States Post Office; and federal government-issued documents. All documentation offered to show tenure is subject

to verification by the Department.

(3)The prospective buyer shall execute a notarized affidavit attesting the buyer has not had an ownership interest in real property, in accordance with Government Code section 54237 (a), paragraph (4). No power of attorney may be used withthis document. Prospective buyer’s affidavit is subject to verification by the Department.

(4)The prospective buyers must execute a notarized affidavit attesting to their intent to reside in the surplus residential property, and must declare their intention to maintain it as their principal place of residence. No power of attorney may be used with this document. Prospective buyer’s affidavit is subject to verification by the Department.

NOTE: Authority cited: Govt. Code §§ 54235, 54236, 54237, 54238, 54238.3, 54238.4, 54238.5, 54238.6, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code § 54237.

§1483 Incomplete or Insufficient Documentation is Grounds for Denial

(a) The Department shall notify a prospective buyer by certified mail if their initial response to the Conditional Offer Prior to Sale is incomplete or insufficient within thirty (30) calendar days from the date the Department receives the prospective buyer’s initial response. The Department’s failure to provide timely notification shall not constitute a determination that a response is complete or sufficient. Additional required documentation must be mailed, by certified mail, to the address identified in the Department’s notice and postmarked no later than sixty (60) calendar days from the postmarked date of the Department’s notice. Failure of the prospective buyer to respond satisfactorily as determined by the Department, or request an extension pursuant to section 1483(b), within the sixty (60) day time period, shall be deemed a rejection of the offer.

(b) The Department shall, upon receipt of a written request prior to expiration of the sixty (60) calendar day time period in this section, grant a forty (40) calendar day extension to provide evidence. The total time period to provide complete and sufficient documentation shall not extend beyond two hundred fifty (250) calendar days from the postmarked mailing date of the Conditional Offer Prior to Sale.

NOTE: Authority cited: Govt. Code §§ 54235, 54236, 54237, 54238.3, 54238.4, 54238.5, 54238.6, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code §54237.

§1484 Failure to Respond Within 120 Calendar Days of Mailing of Conditional Offer Prior to Sale Deemed Rejection.

- (a) Failure to respond to the Conditional Offer Prior to Sale or an initial response received after one hundred twenty (120) calendar days from the postmarked date of mailing of the Conditional Offer Prior to Sale or date of final publication, as applicable, shall be deemed a rejection of the offer.
- (b) The Department shall notify occupants who do not respond in a timely manner to the Conditional Offer Prior to Sale of the rejection of the offer. Such notice shall be mailed first class mail within thirty (30) calendar days of the final day of the initial one hundred twenty (120) calendar day response period.

NOTE: Authority cited: Govt. Code §§ 54235, 54236, 54237, 54238.3, 54238.4, 54238.5, 54238.6, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code § 54237.

§1485 Determination of Eligibility and Qualifications; Prospective Buyers Ranked by Priority, Burden on the Prospective Buyer

- (a) The Department shall review the documentation supplied by, and determine the eligibility of, each respondent for a particular surplus residential property in accordance with section 1477 within sixty (60) calendar days of receipt of documentation. Documentation supplied shall be sufficient for the Department to determine eligibility to meet qualifications. Respondent shall be notified by the Department when supplied documentation is deemed complete.
- (b) When two or more respondents have equal eligibility for a particular surplus residential property, each respondent's relative priority for purchasing the surplus residential property will be ranked according to the postmarked date of the acceptance of the Conditional Offer Prior to Sale. Notwithstanding the foregoing sentence, two or more respondents with equal eligibility for a particular surplus residential property offered to a housing-related private or public entity in accordance with section 1478 shall be ranked in a manner determined by the housing-related private or public entity.

NOTE: Authority cited: Govt. Code §§ 54235, 54236, 54237, 54238.3, 54238.4, 54238.5, 54238.6, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code § 54237.

§1486 Contract for Sale

- (a) Upon determining the respondent with the highest priority to purchase, the

Department shall send the respondent a contract for sale via certified mail. To accept the contract for sale, the respondent shall sign and return the contract for sale via certified mail (return receipt requested) within thirty (30) calendar days from the postmarked date of the Department's mailing of the contract for sale.

(b) Department shall pay the following closing costs:

(1) For affordable price buyers, the Department shall pay customary and reasonable seller's closing costs and buyer's reasonable non-recurring closing costs.

(2) For reasonable price buyers and fair market value buyers, the Department shall pay customary and reasonable seller's closing costs. A buyer will be responsible for customary and reasonable buyer's closing costs.

(c) The Department shall reimburse a prospective affordable price buyer up to a maximum of \$3,000, at time of closing, in the event the buyer chooses to retain an agent to facilitate and advise on the purchase transaction. Such agent must be properly licensed by the California Bureau of Real Estate or The State Bar of California.

(d) Contracts for sale under this chapter are subject to approval by the California Transportation Commission (CTC).

NOTE: Authority cited: Govt. Code §§ 54235, 54236, 54237, 54238.3, 54238.4, 54238.5, 54238.6, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code § 54237.

§1487 Upon Acceptance, Buyer has 120 Days to Close Escrow

(a) Upon execution of a contract for sale, the buyer has one hundred twenty (120) calendar days to close escrow. The Department shall, upon receipt of written request prior to expiration of the one hundred twenty (120) calendar day term in this section, grant a thirty (30) calendar day extension to close escrow.

NOTE: Authority cited: Govt. Code §§ 54235, 54237, 54238.3, 54238.4, 54238.5, 54238.6, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code § 54237.

§1488 Duty of Buyer Upon Noncompliance

(a) Pursuant to Government Code section 54238, in the event a buyer of surplus residential property does not comply with use and resale restrictions imposed pursuant to this chapter, the Department shall

require that the buyer pay the Department the difference between the actual price paid by the buyer for the surplus residential property and the fair market value of such property, at the time of the Department's determination of noncompliance, plus 6 percent interest on such amount for the period of time the surplus residential property has been held by the buyer. Such interest shall be compounded annually.

NOTE: Authority cited: Govt. Code §§ 54235, 54236, 54237, 54238, 54238.3, 54238.4, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code § 54238.

§1489 Monitoring

- (a) All surplus residential properties sold at below the Department approved appraised fair market value shall be monitored at least annually for the duration of the use and resale restrictions to ensure compliance with the provisions therein.

NOTE: Authority cited: Govt. Code §§ 54235, 54236, 54237, 54238, 54238.3, 54238.4, 54238.6, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code §§ 54237 & 54238.

§1490 Lender Limitation

- (a) Except as otherwise provided in the regulations or the Act, no lender shall have or anticipate an interest in or stand to gain financially from the surplus residential property other than that of a mortgage lender.

NOTE: Authority cited: Govt. Code §§ 54235, 54237, 54238.4, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code §§ 54235, 54237, 54238.4.

§1491 Financing

- (a) The California Housing Finance Agency is the State's affordable housing lender, with expertise in developing and administering real estate lending programs and products benefiting persons of low and moderate income. CalHFA is authorized to enter into contracts to administer housing and real estate lending programs for the benefit of other agencies of the State of California. The Department may enter into any agreements or arrangements with CalHFA or other private, local, or state agencies to repair, sell, and monitor surplus residential properties or to otherwise implement the activities of the Act.

(b) In the event CalHFA elects pursuant to adoption by its board of directors to purchase loans or otherwise provide financing to present occupants pursuant to paragraphs (2) or (3) of subdivision (a) of Government Code section 54237 to effectuate such sales by the Department and in accordance with Health and Safety Code section 50093, then the following shall apply:

(1) All proceeds to which the CalHFA is entitled pursuant to section 1478(d) from subsequent sales of all surplus residential property, or pursuant to a transfer, foreclosure, insurance claim or condemnation, related to such property, shall be paid on condition that CalHFA establish a designated account (the "Affordable Housing Trust Account") for such proceeds to be used as follows:

(A) To carry out any activity authorized under CalHFA's implementing statutes for the benefit of persons or families of low and moderate income residing exclusively in the Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and the 90032 postal ZIP code, including any arrangement for the financing of multifamily developments or the purchase of loans made to effectuate the purpose of the Act.

(B) Reasonable fees and costs incurred by CalHFA derived from the origination, purchase, or servicing of any loan under the Affordable Sales Program.

(C) All costs, including outside legal fees, associated with enforcement of the use and resale restrictions.

(2) The use and resale restrictions shall provide that in the event of any transfer, then any outstanding loan balance, penalties, fees, interests and costs associated with collecting on such amounts owed to CalHFA shall be paid to CalHFA prior to the determination of any net proceeds due to the CalHFA.

(3) The use and resale restrictions may be enforceable by CalHFA.

NOTE: Authority cited: Govt. Code §§ 54235, 54237, 54237.7, 54238, Sts. & Hy. Code § 118.6. Reference cited: Govt. Code §§ 54237, 54237.7, 54238.

This page intentionally left blank

Appendix G List of Technical Studies

Community Impact Assessment (May 2015). Prepared by LSA Associates, Inc.

Cumulative Impacts Assessment (April 2015). Prepared by Caltrans.

Final Relocation Impact Report (June 2016). Prepared by Caltrans.

Hazardous Waste Assessment—Excess Properties (February 19, 2014). Prepared by Caltrans.

Hazardous Waste Assessment—Excess Properties (February 27, 2014). Prepared by Caltrans.

Hazardous Waste Assessment—Vacant Lots and Public Facility (October 2014). Prepared by Caltrans.

Hazardous Waste Assessment—Residential (November 2014). Prepared by Caltrans.

Hazardous Waste Assessment—Industrial (February 2015). Prepared by Caltrans.

Historic Resource Compliance Report, Volume I – Historic Properties (March 2015). Prepared by Caltrans.

Historic Resource Compliance Report, Volume II – Non-Historic Properties (March 2015). Prepared by Caltrans.

Natural Environment Study Minimal Impacts (October 2014). Prepared by Caltrans.

Site Investigation for Hazardous Materials/Waste in Soil—Parcel No.3003 (February 2016). Prepared by Stantec Consulting Services, Inc.

Site Investigation for Hazardous Materials/Waste in Soil—Parcel No.3008 (February 2016). Prepared by Stantec Consulting Services, Inc.

Site Investigation for Hazardous Materials/Waste in Soil—Parcel No.18497 (February 2016). Prepared by Stantec Consulting Services, Inc.

This page intentionally left blank

Appendix H Standardized Regulatory Impact Assessment

This page intentionally left blank

Standardized Regulatory Impact Assessment (SRIA)

Proposed Affordable Sales Program Regulation

Summary

Statement of Need for the Proposed Regulation

Streets and Highways Code section 118.6 states that California Department of Transportation (Caltrans), to the greatest extent possible, will offer to sell or exchange property that has been determined by Caltrans to be excess to their needs. Government Code sections 54235 through 54238.7 known as the Roberti Act and amended by Senate Bill 416 in 2013 which includes priorities for disposal of residential properties originally acquired for the State Route 710 (SR-710) extension in the cities of Los Angeles, South Pasadena, and Pasadena and includes requirements that the agency impose terms, conditions, and restrictions to ensure that housing will remain available for low or moderate income households. Together, these codes provide Caltrans with direction to establish a program that includes both excess property sales and an affordable housing program. Adoption of the proposed Affordable Sales Program (ASP) regulations will allow Caltrans to dispose of the surplus parcels of residential real property and endeavor to meet the intended goal of the Legislature of preserving and expanding the availability of low and moderate income housing supply. The proposed regulations will set forth the standards used to calculate the appropriate purchase prices to fulfill the state's mission of providing affordable home ownership to Californians. The proposed ASP regulations will provide the public with guidelines to determine the income levels used to qualify for the program, which in turn promotes fairness and social equity to the buying public.

Public Outreach

Caltrans held two public workshops, on October 23, 2013 and October 24, 2013, to gather input to address the issues deemed most important to the public. Caltrans held the public workshops in El Sereno and Pasadena to receive comments from current tenants, former tenants, and the general public. These comments were reviewed, evaluated, and, as Caltrans deemed appropriate, incorporated into the proposed regulations.

Caltrans held three public hearings, on July 15, 2014, July 17, 2014, and August 21, 2014 to take under submission all written and oral statements submitted or made during these hearings for the Draft Regulations released on May 30, 2014. Three more public hearings were held for the Draft Regulations released on February 27, 2015 on April 20 and 21, 2015 and May 12, 2015.

As required by the Administrative Procedures Act, the text of the proposed regulations, Initial Statement of Reasons, Notice of Proposed Rulemaking and Extension Notices are posted to the internet here: <http://www.dot.ca.gov/regulations.htm>.

News releases were distributed on May 30, 2014, announcing the public written comment period open as of that date through 5:00 p.m. on July 14, 2014. On July 14, 2014, a news release was posted notifying of an extension of the written public comment period to 5:00 p.m. July 31, 2014, and on August 1, 2014, a news release was posted notifying of the second extension of the written public comment period to

5:00 p.m. September 2, 2104. News releases were also distributed February 27, 2015, announcing the public written comment period open through April 13, 2015.

- Ads were posted in three (3) newspapers to increase public awareness of the proposed regulations, written comment period and public hearings.
- On May 29, 2014 Caltrans mailed a package to all tenants and other interested parties which included an Information Notice regarding the property sales for the SR-710 Corridor and the text of the proposed regulations.
- On July 14, 2014, the notice of extension of the written public comment period to July 31, 2014, was mailed to all tenants and interested parties.
- On July 30, 2014, the (second) notice of extension of the written public comment period notice to September 2, 2014, was mailed to all tenants and interested parties.
- On February 27, 2015, Caltrans withdrew the May 30, 2014, regulations and posted new regulations regarding the Roberti Act-Affordable Sales Program. A package was mailed to all tenants and other interested parties which included an Information Notice regarding the property sales for the SR-710 Corridor and the text of the proposed regulations.

Sales

The sale of any state owned property including the properties related to the SR-710 project in Pasadena, South Pasadena, and the El Sereno area of the city of Los Angeles requires that the properties must be declared excess to the state's needs. Caltrans must comply with the California Environmental Quality Act (CEQA) which is concerned with ensuring that there is no significant adverse change to the environment, and Public Resources Code section 5024 which is concerned with ensuring that there is no adverse effect to any historic properties.

There are five alternatives presented in the Environmental Impact Report for the SR-710 North gap closure project. The Final Environmental Impact Report is scheduled to be completed in 2016. Only the tunnel alternative affects the property sales described in the Affordable Sales Program regulations. For this Economic Impact Analysis, because the FEIR is scheduled to be completed in 2016, it is assumed that the vast majority of the parcels will be able to sell regardless of which alternative is selected. Although many of the parcels may need subsurface easements if the tunnel alternative is selected, the effect on the Fair Market Price is estimated to be minimal, due to the subsurface easement being so deep below the surface. This information was provided by the Right of Way Division in District 7.

The initial sale of the properties is planned in three phases:

- **Phase 1:** Properties that are not within the scope of the remaining project alternatives. The environmental document for the non-historic properties in Phase 1 will be completed in early 2015. The environmental document for the historic properties in Phase 1 will be completed in mid 2015.
- **Phase 2:** Properties that are within the scope of the remaining project alternatives for the SR-710 North project but still can be sold. The environmental document for this phase is planned to be completed in mid 2015. The number and specific properties for this Phase are still being studied.
- **Phase 3:** Remaining SR-710 properties will be declared excess after the completion of the approved preferred project alternative in the project environmental document for the SR-710 North project. The Draft Environmental Impact Report was released for circulation in February 2015. The Final Environmental Impact Report is planned to be complete in 2016.

Subsequent Sales:

Subsequent sales are assumed to start immediately with the double escrow described in the ASP Regulations dated February 27, 2015. This occurs when a Housing Related Entity purchases a home at a reasonable price and then concurrently sells it to the current tenant at fair market value. It is assumed that 64 of the single family homes purchased by the Housing Related Entities will be resold concurrently with the original sale to the current owner. It is also estimated that 25% of the multifamily homes and 25% of the remaining 45 single family properties purchased by the HRE's will sell in the next 25 year period. All of the affordable single family homes are assumed to sell during that 25 year time frame.

Major Regulation Determination

After consultation with Department of Finance, it has been determined the proposed regulations will exceed \$50 million in fiscal and/or economic impacts for a 12-month period, after the proposed regulation is estimated to be fully implemented. Fully implemented for this analysis is defined as the five year period needed to sell all the properties plus twenty five years for the subsequent sales for a total of 30 years. From the benefit-cost analysis, the statewide benefit is estimated to be \$315 million and the statewide cost is estimated to be \$100 million for the first five year period.

For the subsequent 25 years, it is estimated that 25% of the multifamily homes will sell, 25% of the single family homes that HRE's purchase and 100% of the affordable properties. The estimated cost including mortgage payments and property tax is \$800 million; the estimated benefit to be used for

affordable housing for the State, the affordable property owners and the housing related entities is \$185 million.

The total 30 year analysis period cost is estimated to be \$900 million and the benefit is estimated to be \$500 million

Economic Baseline:

Without the proposed ASP Regulation, the properties would not be sold, and the properties would continue to be rented as they are today. The baseline is taken from the Bureau of State Audits Report 2011-120, dated August 2012, (2012 Audit) in addition to information obtained from the Division of Right of Way. The total statewide benefit for the baseline for the annual period is \$13.5 million and the annual statewide cost is \$13.5 million. See chart labeled BASELINE (w/o Regulations) on the next page.

Per 2012 Audit and Division of Right of Way:

- 460 total number of parcels. 48 are unimproved and vacant.
- 398 single family residences and multifamily residences are owned by Caltrans, most are rented.
- CA General Fund received ~\$4.8 million/yr in rent.
- CT paid ~\$1.15 million/yr to LA County (24%).
- CT paid ~\$5.5 million/yr in repairs.
- CT support costs for property management ~\$2 million.

Annual Baseline (w/o Regulations):					
Benefits:		Costs:			
			Individual		
Property Management Employees(salaries)	\$ 2,000,000		Rent	\$ 4,800,000	
			State		
Rents (General Fund)	\$ 4,800,000		Maintenance Services	\$ 5,500,000	
Maintenance Services (DGS)	\$ 4,125,000		Los Angeles County (24%)	\$ 1,150,000	
Private Contractors	\$ 1,375,000				
Los Angeles County (24%)	\$ 1,150,000		Property Management (Staff)	\$ 2,000,000	
Annual Total Benefits:	\$ 13,500,000		Annual Total Costs:	\$ 13,500,000	

The Baseline Analysis Period Reported Yearly w/o Regulations:					
YEAR		BENEFITS			COSTS
15/16		\$13.50m			\$13.50m
16/17		\$13.70m			\$13.70m
17/18		\$13.90m			\$13.90m
18/19		\$14.20m			\$14.20m
19/20		\$14.50m			\$14.50m

As of March 2012, Caltrans estimated that the market value of the SR-710 parcels was \$279 million with single family and multi-family residential parcels comprising \$237 million of the estimated market value.

Property Type	City	Units	TOTAL Units	TOTAL all Units	Avg. per unit value, 2012 Audit*	TOTAL Est. Values, 2012 Audit*	TOTAL all Est. Values, 2012 Audit*
SFR	Pasadena	90			1,000,000.00	90,000,000	
	South Pasadena	62			737,000	45,694,000	
	Los Angeles	205			292,000	59,860,000	
					357		
Multi	Pasadena	11			2,314,000.00	25,454,000	
	South Pasadena	11			900,000	9,900,000	
	Los Angeles	19			316,000	6,004,000	
					41		
Total Residential				398			\$236,912,000

*Bureau of State Audits Report 2011-120, August 2012

Construct an analysis period:

30 year analysis period

The current schedule has the ASP regulations effective in fall 2015. The early escrow close date is in 2016 for the non-historic properties in Phase 1 and later in 2016 for the historic, phase 2 and phase 3

properties. Based on this, the analysis will assume no Roberti properties will be sold in the 2014/15 fiscal year. The first five years of the analysis period are for initial property sales and double escrow sales and the last 25 years are for the remaining subsequent sales.

Per the 2012 audit, there are 398 single family residences and multi-family residences to be sold.

Determine the universe of properties to be sold for the initial sales including the double escrow sales and the subsequent sales.

- Per the 2012 Audit, there are 398 residential properties to be sold: 357 single family properties and 41 multi-family parcels.
- Identify FMV for the properties listed above.
 - In 2012, the estimated market value of the residential property was \$237 million. Home values in this vicinity are predicted on Trulia and Zillow to increase 20% by the end of 2014 from 2012. The 2014 value is estimated to be \$286 million. In addition, they are estimated to go up 5% per year for the rest of the analysis period. A 5% increase in rent was also assumed for this economic analysis.
- Identify properties that may be purchased by occupants with low or moderate income at an affordable price, housing related private and public entities at a reasonable price and others at a FMV price. Alternatively, develop a methodology for estimating what proportion of the properties will be sold at affordable prices.
 - Assume 100 single family properties will sell at an affordable price. (Assume approximately half of properties will be offered at an affordable price and approximately half of those will sell at an affordable price.)
 1. Pasadena- 25
 2. So. Pasadena- 18
 3. Los Angeles- 57
 - Assume all 41 multi-family homes will sell to housing-related public and private entities at a reasonable price.
 - Assume housing related entities will purchase 45 single family homes that are not wanted by current tenants. These include some boarded up properties and other fixer uppers, in addition to properties that can be used as “cluster housing”.
 - Assume the remaining properties will sell at FMV. Per the 2012 audit: 398-100-41-45=212 single family properties. Of these 212, approximately 30% will sell to current tenants which will utilize the double escrow allowed in the regulations. 30% of 212=64 homes. 212-64=148 properties will have their initial sale at FMV.
 1. Pasadena- 30
 2. So. Pasadena- 18
 3. Los Angeles- 100

- Total estimated properties that sell to housing-related public and private entities at a reasonable price. $41+64+45=150$
 1. Pasadena- 46
 2. So. Pasadena- 37
 3. Los Angeles- 67

Although 58 properties were rented at an affordable price in 2012 when the audit was completed, that number has increased to approximately 175 with the new affordable rent regulations.

Of the 460 total number of parcels- 398 are single and multifamily properties; 48 are unimproved and vacant so can be sold outside the Roberti Regulations, and the remaining 14 are either unimproved or vacant. These 14 properties are assumed to sell at FMV for ~\$ 10 million in 2014 dollars.

Breakdown of Single Family and Multi Family Properties Sold at an Affordable Price, Reasonable Price, and at Fair Market Value

Fiscal YR	Total number of residential properties sold	Total number of Affordable properties sold	Total number of Reasonable properties sold	Total number of Fair Market Value residential properties sold
15/16	42	8	17	17
16/17	68	19	23	26
17/18	88	23	32	33
18/19	90	23	32	35
19/20	110	27	46	37
Totals	398	100	150	148

Develop affordable and reasonable prices for the properties above.

- Per the 2012 audit, the average price (assume to be FMV) for Single family parcels is:
 - Pasadena– \$1 million
 - So. Pasadena– \$737,000
 - Los Angeles– \$292,000

- Per the 2012 audit, the average price for Multi-family residential parcels is:
 - Pasadena– \$2.3 million
 - So. Pasadena– \$900,00
 - Los Angeles– \$316,000

Home values in this vicinity are predicted to increase 20% by the end of 2014 from 2012.

- Single family parcels

- Pasadena– \$1.2 million
- So. Pasadena–\$885,000
- Los Angeles–\$350,000
- Multi-family homes
 - Pasadena– \$2.8 million
 - So. Pasadena–\$1.1 million
 - Los Angeles–\$380,000

Per 2012 Audit, assume the purchase price for a single family property sold at an affordable price is 17% of FMV. The price in 2014 is estimated to be:

- Pasadena
 - 25 homes
 - \$204,000
- So. Pasadena
 - 18 homes
 - \$150,000
- Los Angeles
 - 57 homes
 - \$60,000

Assume the purchase price for a property sold at a reasonable price is 60% of FMV. The actual value will be determined through a request for proposal. One requirement is that the value must be greater than the department paid for the property originally. The assumed 60% of FMV was based on the advice and expertise of employees in the Division of Right of Way.

The price in 2014 is estimated to be:

- Pasadena
 - \$1.68m MF
 - \$720,000 SF
- So. Pasadena–
 - \$660,000 MF
 - \$530,000 SF
- Los Angeles–
 - \$230,000 MF
 - \$210,000 SF

Although the home prices increased 20% between 2012 and 2014 (10% per year), this analysis assumes home prices and rents will increase 5% per year from 2015/16, based on previous sales in the last 30 years.

For this analysis, we are assuming 30% of the original properties assumed to sell at FMV are from the current tenants and will be sold concurrently from the Housing Related Authorities through the double escrow process described in the regulation. Double escrow is estimated to affect 64 single family properties.

Discuss the Benefits and Costs:

First five year analysis period- includes initial sales and double escrow sales

Benefits:		Costs:	
Individuals		Individual	
		Mortgage	\$ 31,000,000
Disposable Income	\$1,400,000	Rent	\$ 15,600,000
Relocation Assistance	\$2,500,000		
Property Management/Sales employees	\$32,700,000		
STATE		STATE	
Property Sales Proceeds to SHA	\$218,000,000	Property Sales (Staff)	\$25,200,000
Rent (CA Gen.Fund)	\$15,600,000		
Property Sales Proceeds to the AFTA from Subsequent Sales	\$10,000,000		
Property Sales Proceeds to Affordable Housing Related Entities from Subsequent Sales	\$10,000,000		
Maintenance Services (DGS)	\$9,600,000	Relocation Assistance	\$2,500,000
		Property Management (Staff)	\$7,500,000
Private Contractors	\$3,000,000	Maintenance Services	\$12,600,000
Los Angeles County (24%)	\$3,800,000		
Los Angeles County (Property Tax Assessment)	\$7,000,000	Los Angeles County (24%)	\$3,700,000
Total Benefits:	\$315,000,000	Total Costs:	\$100,000,000

Costs

As shown in the chart on the prior page, the total costs for the Regulation for the five year analysis period is estimated to be \$100 million dollars. This includes:

- Maintenance services are estimated to be \$12.6 million.
- The property management staff is estimated to cost approximately \$7.5 million.
- To sell the properties, it is estimated to be \$20 million.
- The relocation assistance Caltrans pays is estimated to be \$2.5 million.
- The 24% the State pays to LA County is \$3.7 million.
- Mortgage payments are estimated to be \$31 million.
- The total rent paid by individuals is estimated to be \$15.6 million.

Another cost is to the California General Fund which receives the rent money. The general fund will not receive the \$4.8 million per year once the properties sell.

Benefits

As shown in the chart on the prior page, for the five year analysis period, the total statewide benefit is estimated to be \$315 million. Included in this total is:

- Property Sales paid to the State Highway Account are estimated to be \$218 million.
- Amount paid to the Affordable Housing Trust Account (AHTA) from subsequent sales is estimated to be \$10 million.
- Amount paid to the Housing Related Entities is estimated to be \$10 million.
- Total rent paid to the General Fund is estimated to be \$15.6 million.
- Total payment to DGS for maintenance services is \$9.6 million.
- Disposable income for individuals is estimated to be \$1.4 million.
- Relocation assistance to individuals is estimated to be \$2.5 million.
- Maintenance services paid to the locals and others is \$3.0 million.
- Property tax assessment and 24% paid to the LA County is estimated to be \$10 million.
- Salaries paid for property sales are estimated to be \$25 million.
- Salaries paid for property management is estimated to be \$7.5 million

The remaining 25 years:

The next 25 years are for the remaining subsequent sales. It is estimated that all 100 affordable properties will sell during the remaining 25 years and 25% (10) of the remaining 41 multifamily homes and 25% (11) of the 45 single family properties purchased by the HRE's will sell. The home prices are estimated to increase 5% a year, this is actually slightly less than what has occurred in Los Angeles in the last 30 years.

The regulations state that the subsequent sales of affordable properties and housing-related private entities will be monitored. With the equity sharing model proposed, we believe the monitoring will be

inconsequential. For the 100 affordable properties, annual monitoring is proposed. This will include an annual property inspection and review of the deed to confirm the property is still inhabited by tenants and all covenants and restrictions are being abided by. For the housing related entities, only the private ones have to be monitored and we anticipate a minimal number of private housing related entities taking participation in this process. The estimate is less than ¼ of one py, ~\$25,000 per year.

Costs:

For the remaining 25 years

<u>Years</u>	<u>Total Mortgage Payments</u>	<u>Property Taxes</u>
2020-2024	\$100 million	\$24 million
2025-2029	\$110 million	\$30 million
2030-2034	\$125 million	\$34million
2035-2039	\$130 million	\$40 million
2040-2045	<u>\$145 million</u>	<u>\$45 million</u>
	\$610 million	\$173 million

Benefits

<u>Years</u>	<u>Net Appreciation to Affordable Buyers</u>	<u>Net equity to AHTA</u>	<u>Housing Related Entities</u>
2020 - 2024	\$7 million	\$17 million	\$6.5 million
2025 - 2029	\$10 million	\$15 million	\$13 million
2030 - 2034	\$10 million	\$10 million	
2035 - 2039	\$23 million	\$15 million	
2040 - 2045	<u>\$35 million</u>	<u>\$20 million</u>	
Total	\$85 million	\$77 million	<u>\$19.5 million</u>

As seen in the chart above, for the resale of the 25% of the multifamily homes over the next 25 years, the Housing Related Entities would gain \$20 million. The AHTA would gain \$77 million for the resale of the affordable houses and the affordable property owners would gain \$85 million. The total benefit is estimated to be \$181.5 million.

The proposed ASP regulations will not cause any competitive advantage or disadvantage for businesses currently doing business within the state nor affect the ability of California businesses to compete with other states by making it more costly to produce goods or service here. It will also not provide any incentive or disincentive for innovation within the state.

Macroeconomic Impacts

The economic impact method and approach, including the underlying assumptions the agency used and the rationale and basis for those assumptions.

The economic impact assessment was derived using regional economic multipliers (RIMSII, Type II Output) to estimate employment, output, and value added from changes in disposable income due to the sale of surplus parcels of residential real property owned by Caltrans. Also, State law requires the proceeds from the initial sale of surplus properties by Caltrans be used to fund transportation infrastructure investments in the immediate vicinity of the affected communities. The economic impacts from these investments are evaluated using an imbedded input-output model to the Transportation Economic Impact Model (TREDIS), providing employment, output and value added effects. Changes in disposable incomes result from the purchase of properties at an affordable price occupied by the current tenant, and the difference between the rent paid by the occupant and the estimated mortgage payment after purchase. Change in disposable household income also includes differences in estimated qualifying income necessary to rent FMV parcels and the estimated qualifying income required to purchase the same parcel at FMV. Historically, Caltrans has rented the parcels, including parcels that we estimate will sell for an affordable or reasonable price, well below comparable rates in the surrounding area. Below is a list of the assumptions used to complete the economic impact assessment and the Rationale and Basis.

Change in disposable income from the purchase of properties at an affordable price

Assumptions:

- One hundred single family parcels would be sold at an affordable price to existing tenants.
- Forty-one multi-family parcels and 109 single family parcels would be sold to public/private housing authorities at a reasonable price.
- Existing rent is based on the average rent paid as described in the California State Auditor, August 2012 Report.
- Rent was adjusted to reflect the affordable, reasonable and FMV prices and the average rent established from the California State Auditor, August 2012 Report.
- Values for properties purchased at affordable and at FMV prices was determined by the 2012 Audit. The 2012 Audit states that the affordable price will be approximately 17% of FMV. The Reasonable Price of 60% of FMV was based on advice and expertise from the Division of Right of Way.
- The Bureau of Labor Statistic reports the average household in Los Angeles County spends 37% of its income on housing.
- Mortgage terms used to establish average mortgage payment: 30 conventional, 10% down payment at 4% interest.
- The number of affordable, reasonable and FMV parcels sold each year were estimated using the five year property sell analysis period.
- Rent to existing tenants was escalated 5% annually.

- Values of parcels were escalated 10% per year from 2012-2014 based on Trulia and Zillow and then 5% each year.
- Mortgage payments were escalated 2% each year to reflect increased property tax payments.

Change in disposable income from the purchase of FMV parcels

Assumptions:

- 30% of FMV parcels would be purchased by existing tenants and 70% would be purchased by non-tenants.
- Estimated household income from all non-tenants purchasing parcels would fully replace estimated household incomes from previous tenants.
- All other assumptions described above were applied.

Sales of 41 multi-family units were excluded from this analysis because it is assumed that affordable housing organizations would purchase these units, renting them to qualifying households with low and moderate incomes. Caltrans does not expect a significant change in household income in the region from the sale of these parcels.

The specific categories of individuals and business enterprises that would be affected by the proposed major regulation

This analysis assesses the direct impact of renters and purchasers of surplus parcels of residential real property owned by Caltrans from two distinct situations: 1) households currently renting at affordable rates electing to purchase their parcel at an affordable price, and 2) households renting FMV parcels at rents significantly under comparable FMV rents replaced by households purchasing these parcels and have higher incomes necessary to qualify for their purchase. The analysis compares the net difference in disposable income for each situation to determine the economic impact to the region.

Proceeds from the initial sale of surplus parcels of residential real property owned by Caltrans are to be used to fund transportation projects in the immediate vicinity of the affected communities. This analysis uses an input-output model to assess the economic impacts from the annual investment of these funds. Investment of funds for transportation projects result in direct, indirect and induced employment, output and value added benefits. Proceeds are applied to the year immediately following sale of properties and measure the short-term (1-year) impact.

The use of economic multipliers and input-output models provides an assessment of total impacts on the regional economy. This assessment does not include impacts to individual businesses. The proposed regulation does not impose direct restrictions or reporting requirements on individual businesses that would result in a financial burden. Individual business may be indirectly impacted from changes in disposable incomes.

The money from the subsequent sales will go to the property owners, the AHTA and the Housing Related Entities. Upon the subsequent sale, the difference between the less than fair market value price

and the fair market value at the time of the sale from Caltrans would be due to the AHTA for the affordable property or split with the AHTA and the Housing Related Entity for properties that are purchases at a reasonable price. The appreciation will be split between the AHTA and the persons or families or Housing Related Entity that purchased the property from Caltrans based on a sliding scale growing 20% each year after the end of the first year of ownership, and ending after the end of the fifth year at which time the less than fair market value purchaser will get 100% of the net appreciation.

The regulations state that if any monies are given to CalHFA, that they will use the money to carry out any activity authorized under CalHFA's implementing statutes for the benefit of persons or families of low and moderate income residing exclusively in the Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and the 90032 ZIP code areas, including any arrangement for the financing of multifamily developments, or the purchase of loans made to effectuate the purpose of the Roberti Act. Also included are any reasonable fees and costs incurred by CalHFA derived from the origination, purchase, or servicing of any loan under the Affordable Sales Program and all costs, including outside legal fees, associated with enforcement of the use and resale restrictions.

For the Housing Related Entities that purchase at a reasonable price and split the equity proceeds with the AHTA and receive 100% of the appreciation after 5 years, the regulations state that the net proceeds paid to housing-related entities shall be used to preserve, upgrade and expand the supply of affordable housing exclusively in the Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and the 90032 ZIP code. The AHTA is estimated to receive \$85 million over 30 years from the subsequent sales and the Housing Related Entities are estimated to receive \$30 million over 30 years. Currently, the Housing Authority of the County of Los Angeles, for the 2015/2016 annual plan has a financial resource estimate of \$266 million, the additional estimated \$4 million from the AHTA and the HRE's would add an additional ~1.5% money to the affordable housing financial resources.

The additional \$85 million given to the AHTA and \$30 million given to the Housing Related Entities are expected to have a positive impact on low and moderate income households. The lack of local development data makes it challenging to estimate household financial gains. The reinvestment impact of the \$118 million, over 30 years, to local low and mid income households cannot be determined without understanding how agencies will specifically spend the additional money. This level of detail is necessary to estimate how direct, indirect, and induced benefits will accrue through expenditures such as constructing or repairing homes, developing livable communities, or offering low interest loans to potential buyers. Thus, general impact assumptions can be made, but without specific reinvestment details, the impacts cannot be quantified.

A study by the California Department of Housing and Community Development, CA Department of Housing and Community Development, CA Tax Credit Allocation Committee, CA Housing Finance Agency, et. al.(2014). *2014 California Affordable Housing Cost Study* and a report by the Center for Housing Policy, Center for Housing Policy. (2011). *The Role of Affordable Housing in Creating Jobs and Stimulating Local Economic Development: A Review of the Literature* generalizes that localities may experience positive economic gains if affordable housing is expanded. HCD's Study iterates that

there are multiple factors that influence economic growth and affordable housing may be a key component. Affordable housing's economic impact on a locality is understood to possibly have a positive economic impact, but both publications cite it is difficult to quantify without a standardized methodology and more research must be conducted to understand the correlation between affordable housing and a local economy. Thus, individuals, businesses, and governments may theoretically benefit from affordable housing, but is not for certain without more information.

Individual Benefits

HCD's Study finds that affordable housing may result in an increase of disposable income. This is because a decrease in housing costs frees up money to spend on other expenditures (p. 14). Thus, this may lead to greater household utility—the increase in gratification from receiving additional goods or services.

Moreover, HCD's Study finds that there is no definitive relationship between affordable housing projects and property values. These two independent variables may be dependent on a confluence of factors such as prevailing wage laws, type of housing project, location, etc.

Business and Government Benefits

According to HCD's Study, an increased labor pool may occur if a greater amount of new affordable housing options are provided for the region. HCD's Study finds that "affordable housing can affect an employer's ability to attract and retain employees and thus have implications for regional economic competitiveness (p. 16)." Affordable housing can allow households to stay in a locality longer than they could normally afford if they paid fair market value; therefore, this may help with expanding the labor pool and employment retention.

Both publications state that government entities may incur greater financial loss if no or minimal affordable housing is offered in a locality. These higher costs include infrastructure maintenance, debris removal, record keeping, and social programs. HCD's Study finds that reducing homelessness through affordable housing may reduce social program costs such as California's Project 50. Project 50 lowered incarceration and medical services costs by \$1.2 million in the initial year of the program. The Center for Housing Policy report also finds that affordable housing decreases business and municipality costs by decreasing the amount of foreclosures and actually results in additional taxes and revenues.

For these reasons, we have limited this assessment to only show the wage effects on consumption by those employed at the Housing Related Entities. The assessment assumes 20 percent of the revenues would be paid in wages to staff at the Housing Related Entities, totaling \$2.0 million during the initial five year analysis period and \$4.0 million during Year 6 to Year 30. These wages will generate approximately \$1.5 million during the initial five year analysis period and \$3.0 million during Year 6 to Year 30 in value-added to the economy.

The inputs into the assessment of the economic impact

- Affordable, reasonable, and fair market sales prices and rent.
- Private mortgage insurance (0.052%).
- Property tax (1% initial, 2% following years).
- 5% escalation value used for rent and sales.
- RIMSII Type II Multipliers for LA County (output, employment, and value-added).
- IMPLAN input-output model (TREDIS Transportation Impact Model).

The outputs from the assessment of the economic impact

The money that the state receives from selling the properties per the Roberti Bill, GC 54237.7 is designated to go to the 710 Rehabilitation Account, up to \$500,000, then to the State Highway Account to fund projects located in Pasadena, South Pasadena, Alhambra, La Canada Flintridge, and the 90032 zip code. The economic analysis for the construction investment assumed that all the construction dollars less the \$500,000 would be spent the following year.

For the five year analysis period, \$260 million dollars would be invested; the output is calculated at \$366 million, the total employment sustained or created for the six years is 1823 jobs and the value added is \$405 million. Another economic analysis was completed for the disposable income. The total disposable income was calculated at \$2 million, the output was approximately \$3 million; the employment sustained or created is 19 jobs and the value added \$1.7 million.

Economic Impact of Disposable Income

REGULATION				
Year	Disposable Income	Output	Employment	Value-Added
15/16	\$ 21,655	\$ 27,766	0.2	\$ 16,503
16/17	\$ 141,988	\$ 182,058	1.2	\$ 108,209
17/18	\$ 247,471	\$ 317,307	2.1	\$ 188,598
18/19	\$ 403,664	\$ 517,578	3.4	\$ 307,632
19/20	\$ 582,754	\$ 747,208	5.0	\$ 444,117
20/21	\$ 833,023	\$ 1,068,102	7.1	\$ 634,847
Total	\$ 2,200,000	\$ 2,900,000	19.0	\$ 1,700,000

Economic Impact of the Construction Investment:

REGULATION-				
Year	Construction Investment	Output	Employment	Value-Added
15/16				
16/17	\$ 25,100,000	\$ 35,300,000	176	\$ 39,100,000
17/18	\$ 46,400,000	\$ 65,200,000	325	\$ 72,200,000
18/19	\$ 59,500,000	\$ 83,600,000	417	\$ 92,600,000
19/20	\$ 63,200,000	\$ 88,800,000	442	\$ 98,400,000
20/21	\$ 66,200,000	\$ 93,000,000	463	\$ 103,100,000
Total	\$ 260,400,000	\$ 365,900,000	1,823	\$ 405,400,000

A regional analysis was applied to the SRIA SR-710 economic impact analysis. The sale of Caltrans homes is expected to have a positive impact to household discretionary income and lead to an increase in sale proceeds. This increase in discretionary income can induce economic activity through home renovation expenses such as hiring contractors, purchasing construction and building materials, permitting fees, and inspections. RIMS II Type II multipliers for LA County aggregate total regional impacts and include direct, indirect, and induced final demand stage economic impacts. Thus, spending wages leads to an induced economic impact.

Government Code 54237.7 requires the initial sale of home proceeds to be used for transportation purposes in the involved communities. Transportation purposes include, but are not limited to “sound walls, transit and rail capital improvements, bikeways, pedestrian improvements, major street resurfacing,” etc. IMPLAN and TREDIS (input-output economic models) were used to estimate the impact to employment, output, and value added. The amount of regional indirect and induced impacts depends on the type of transportation project. For example, a transit project is likely to result in a greater amount of monetary leakage than a roadway pavement project. Transit railcar manufacturers are likely to be located outside the region; therefore, the proceeds generated from the regional home sales will be transferred to a company outside the region. Proceeds used for a roadway pavement project are more likely to be spent within regional businesses to supply the asphalt concrete and paint needed. Thus, depending on the type of project selected, the circulation of regional money will vary.

Caltrans estimates the sale of 398 single family and multifamily dwellings will result in a small amount of ancillary economic gains. Some of these units have deferred maintenance and Caltrans is required to repair them before placing them on the market. Under California Government Code 54237(b), public agencies that own surplus residential properties must “provide repairs required by lenders and

government housing assistance programs” to make them “decent, safe, and sanitary.” Pursuant to Section 54237.7 (AB 416, Liu, 2013) of the California Government Code, Caltrans can spend an annual of \$500,000 to repair residential units. This would equate to \$2.5 million of indirect and induced benefits from the sale of surplus residences, assuming the maximum amount is utilized over five years.

Caltrans recognizes that this requirement would contribute to the retention, creation, and increase in regional economic conditions such as jobs, output, and value-added. Given the economic tools available, Caltrans cannot specifically determine the economic impact to individual industries or stakeholders. However, from an industry perspective, Caltrans estimates the greatest economic impact will be seen in housing related industries, such as an increase in demand for contractors and inspectors, housing materials, and permits. Sale proceeds specifically dedicated to fund transportation projects will vary depending on the type of transportation project selected in the region. Furthermore, the homes sold to nonprofit housing authorities would continue to offer affordable housing and charge below market value. Under this assumption, there are few, if any, economic gains. Caltrans views homes sold to nonprofit housing authorities as a transfer of responsibilities, benefits, and costs. From a regional outlook, indirect and induced economic impacts generated from the sale of these homes are minimal when compared to the economy of LA County, which is estimated to be in the hundreds of billions of dollars. Also, Caltrans estimates the rental revenue loss to the General Fund would have a minimal impact on the State. The loss in rental revenue is minimal when compared to the overall total of General Fund revenue and the potential increase in personal income and economic activity from home sales. California’s General Fund, on average, collects nearly \$100 billion in a given year; this includes personal income, sales and use, and corporate taxes—approximately 90% of California’s total revenue. Moreover, the \$4.8 million gross loss per year from the sale of homes would be minimized through increased employment opportunities and goods purchased within the region. Thus, the General Fund would collect additional tax revenues, minimizing the loss of rental revenue to the State.

Agency’s Interpretation of Economic Impact of the Regulation

On average, the purchase of property at an affordable price by the existing tenants will result in increased disposable income for these households. This is due to favorable purchase prices available to existing tenants and low mortgage interest rates. Because of these circumstances, existing tenants of these parcels realize a lower mortgage payment than what they were paying in rent. This is true even though the State Auditor’s Office found that Caltrans was under charging its tenants by an estimated 43 percent. The increase in disposable income will result in increased economic activity, with corresponding improvements in employment, income and added-value reflected in the findings. The net positive impacts do not include the intangible benefits born by the affected households and the surrounding community.

The sale of parcels at FMV provides the greatest impact on the regional economy. The estimated value of these parcels implies that many existing tenants would not qualify to purchase them. This assumption relies, once again, on the State Auditor’s Office findings that Caltrans has been under charging rents. At fair market prices, qualifying income would be two to three times higher than what is necessary to

qualify as a tenant. Tenants who are unable to qualify for the purchase of FMV parcels will be replaced by households earning substantially higher incomes. These higher earning households will inject increased spending in the community, and the region at large.

Lastly, legislation requires that the proceeds from the initial sale of surplus property be re-invested in transportation infrastructure in the immediate area. Upwards of \$250 million in transportation investment will result in direct, indirect and induced jobs, income and value-added being generated to the community.

Alternatives:

Alternative 1

The first alternative assumes that the initial five year period remains the same. In the subsequent 25 years, only 50% of the 100 affordable homes sell and the same 25% of the reasonable properties sell.

Cost and Benefit

As with the original alternative, for the first five year period, the statewide benefit is estimated to be \$315 million and the statewide cost is estimated to be \$100 million. For the subsequent 25 years, the estimated cost including mortgage payments and property tax is \$725 million, the estimated benefit to the AHTA is \$42 million, the affordable property owners is \$44 million and the housing related entities is \$18 million.

The total 30 year analysis period cost is estimated to be \$825 million and the benefit is estimate to be \$415 million.

Reason for Rejecting: This alternative assumes only half the affordable properties sell, cutting in half the benefit to the affordable property owners and the benefit to the AHTA.

Alternative 2

The second alternative assumes that initial five year period remains the same as the original and alternative 1. In the subsequent 25 year period, it is assumed that 100% of all the affordable and reasonable properties sell as soon as the 100% appreciation is reached, i.e., at six years for each property.

Costs and Benefits

As with the original alternative, for the first five year period, the statewide benefit is estimated to be \$315 million and the statewide cost is estimated to be \$100 million. For the subsequent 25 years, because the assumption is that all the properties sell at year six so they get 100% of the appreciation, the estimated cost including mortgage payments and property tax is \$910 million, the estimated benefit to the AHTA is \$78 million, the affordable property owners is \$30 million and the housing related entities is \$38 million.

The total 30 year analysis period cost is estimated to be \$1 billion and the benefit is estimated to be \$455 million.

Reason for Rejecting

This alternative reduces the benefits to the affordable property owners because it assumes they sell as soon as they reach 100% of the appreciation but before they get the gains from the 5% increase in property values each year. The cost is higher because the mortgage costs and property taxes go up because all the properties sell.

This page intentionally left blank

Appendix I Notice of Preparation

This page intentionally left blank

NOTICE OF PREPARATION

To: Responsible, Trustee, and
Federal Agencies

From: California Dept. of Transportation
100 S Main Street MS 16A
Los Angeles, CA 90012

Subject: **Notice of Preparation of a Draft Environmental Impact Report**
Reference: California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375.

Project Title: SR-710 Surplus Property Sale

Project Location: In the Cities of Pasadena, Southern Pasadena and Los Angeles

Project Description: Caltrans proposes to sell surplus properties originally acquired for a surface freeway project on State Route 710 in the cities of Los Angeles, Pasadena and South Pasadena in Los Angeles County. Some of the properties are listed on/or eligible for, the National Register of Historic Places, California Register of Historic Resources and/or designated locally significant.

This is to inform you that the California Department of Transportation will be the lead agency and will prepare an environmental impact report for the project described above. Your participation as a responsible agency is requested in the preparation and review of this document.

We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Expected environmental issues are anticipated to be Archaeological, Historical and/or Community based and shall be further examined in the technical reports. Your agency will need to use the EIR prepared by our agency when considering your permit or other approval for the project.

A project area map is attached.

A copy of the Initial Study (is) (is not) attached.

Due to the time limits mandated by State law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

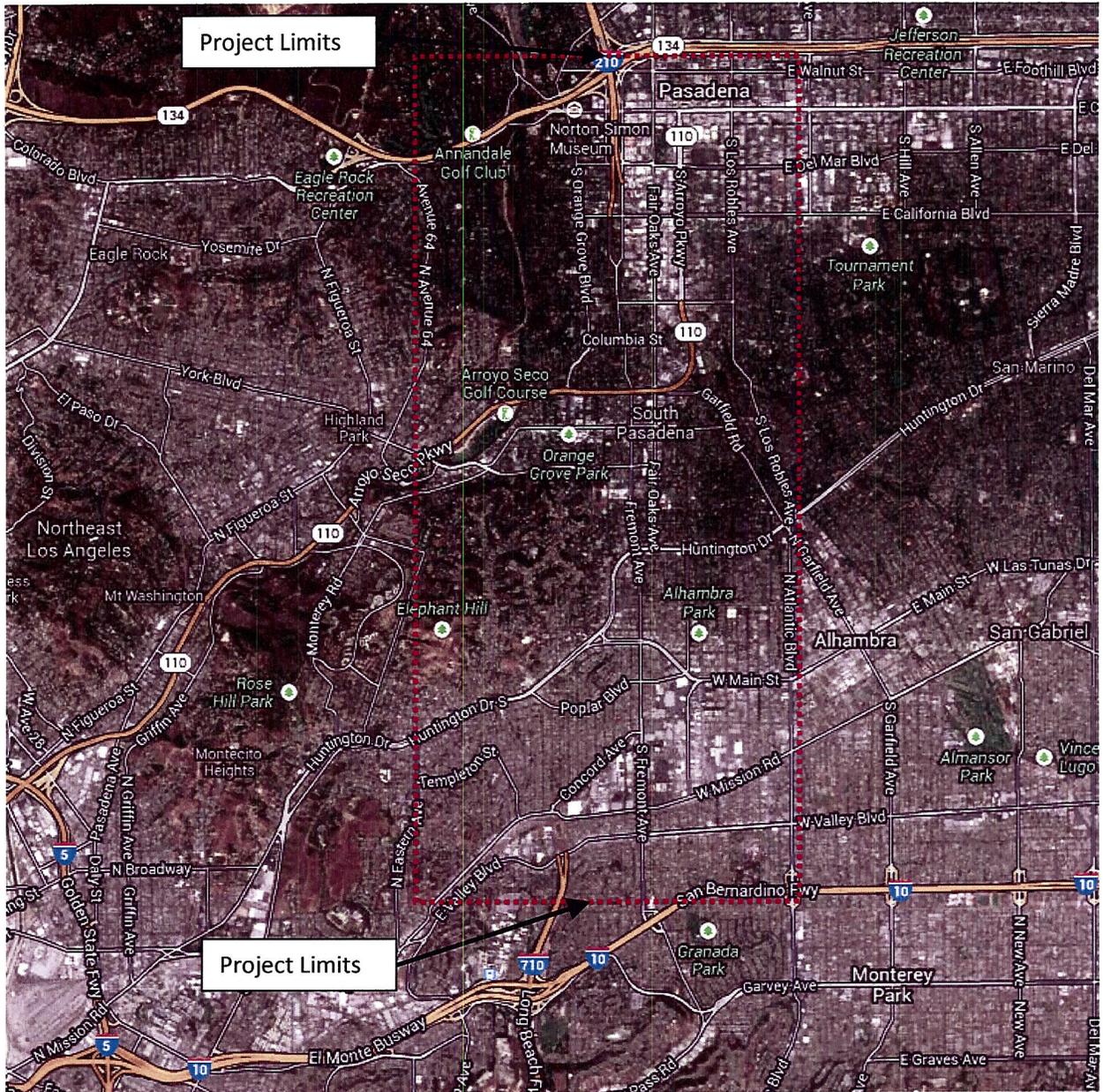
Please direct your response to Dawn Kukla Telephone (213) 897-3643 at the address shown above. Please supply us with the name for a contact person in your agency.

Date 6-27-2014

Signature
Title

Ronald Kowalski
DDD for BAV. PLANNING

Project Area Map



Kukla, Dawn E@DOT

From: John Mayer [JMayer@SouthPasadenaCA.gov] GAD
Sent: Thursday, July 03, 2014 1:28 PM
To: Kukla, Dawn E@DOT
Subject: Request for EIR - SR-710 Surplus Property Sale

Good Afternoon, Dawn. We are interested in reviewing the Draft EIR when it becomes available regarding the SR-710 Surplus Sale. Below, you will find my address.

Thank you, and Happy 4th!
John

John Mayer
City of South Pasadena
Senior Planner
626.403.7228
jmayer@southpasadenaca.gov

This page intentionally left blank

LAW OFFICE OF
CHRISTOPHER SUTTON
586 LA LOMA ROAD
PASADENA, CALIFORNIA 91105-2443
TELEPHONE (626) 683-2500 ... FACSIMILE (626) 405-9843
Email: christophersutton.law@gmail.com

Monday, July 7, 2014

Ronald J. Kosinski
Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 South Main Street, Suite 100
Los Angeles, CA 90012

Tel: (213) 897-0703
Fax: (213) 897-0685

Re: **Public Records Request - California Department of Transportation ("Caltrans") - 710 Surplus Property Sale Project - Draft Environmental Impact Report ("DEIR") - Notice of Preparation**

Mr. Kosinski:

This office represents a group of tenants residing in Caltrans properties along the proposed I-710 North corridor in the cities of Pasadena, South Pasadena, and Los Angeles. The goal of my clients (collectively the "Caltrans Tenants") is to negotiate the purchase of their homes from Caltrans.

Recently, some of my clients received a letter signed by you regarding the issuance of a Notice of Preparation ("NOP") for the DEIS related to the 710 Surplus Property Sale Project. Your letter claims the NOP is on file with the California State Clearinghouse. A search of the State Clearinghouse website resulted in **no notices** filed regarding the 710 Property Sale.

Your letter also invited members of the public, including the Caltrans Tenants, to comment on the NOP by no later than thirty (30) days after receipt of the letter. Your letter is dated July 2, 2014. Caltrans has set a deadline to receive comments on its NOP by **no later than** August 2, 2014. Additionally, comments regarding the draft sales regulations are due on July 14, 2014 - one week from today.

Please note, the State Clearinghouse website has **no notices** filed regarding the 710 Property Sale. Furthermore, the State Clearinghouse website shows **no notices** prior to May 31, 2014. The NOP for the 710 Property Sale could take **months** before it appears at the State Clearinghouse website. It is **not possible** for the Caltrans Tenants or any other members of the public to prepare substantive comments to the NOP without access to the NOP and a reasonable amount of time to review it. Your letter also includes a phone number to discuss further questions with Dawn Kukla. Be advised, this help line **is disconnected**. See attached letter.

By failing to provide the Caltrans Tenants and the public reasonable access to the NOP prior to the end of the comment period, Caltrans may be **illegally denying** the public its right to due process

Pursuant to the California Public Records Act, Government Code sections 6250 to 6277, and Article One, section 3(b) of the California Constitution (constitutional right to public records), we hereby request the following records:

1. **A true and correct copy of the Notice of Preparation ("NOP") regarding the 710 Property Sale Project.**
2. **A true and correct list of historic or potentially historic properties, including single-family residences, multi-family residences, vacant lots, and others in Pasadena, South Pasadena, and Los Angeles to be considered in the Draft Environmental Impact Report ("DEIS") for the 710 Property Sale Project.**

Thank you for your help in this matter. We look forward to hearing from you as soon as possible.

Sincerely,


Christopher Sutton
Attorney for Caltrans Tenants

CAS:jk

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, Division of Environmental Planning
 100 South Main Street, Suite 100
 LOS ANGELES, CA 90012-3606
 PHONE (213) 897-8016
 TTY (213) 897-4937



*Flux your power!
 Be energy efficient!*

July 2, 2014

Individuals Interested in the 710 Surplus
 Property Sale

File: 07-LA-710
 710 Surplus Property Sale

Subject: Notice of Preparation / Initiation of Studies for a Draft Environmental Impact Report (EIR) for the 710 Surplus Property Sale Project

A Notice of Preparation (NOP) for a Draft EIR for the 710 Surplus Property Sale Project, which consists of selling the surplus properties originally purchased for a surface freeway project on State Route 710, between the I-10/SR710 Interchange and the I-210/SR134 Interchange, in the cities of Pasadena, South Pasadena and Los Angeles, has been filed with the State Clearinghouse. The California Department of Transportation (Caltrans) is the Lead Agency for the proposed project under the California Environmental Quality Act (CEQA).

The purpose of the NOP is to describe the proposed action, solicit input regarding the scope and content of the analysis in the Draft EIR, and identify the potential environmental impacts that the Draft EIR will evaluate. Expected environmental issues are described in the NOP, and include historic preservation and community impacts.

Caltrans would appreciate your comments, suggestions, or concerns regarding potential environmental impacts related to the proposed project. Please respond at the earliest possible date, but not later than 30 days after receipt of this notice. We would appreciate your comments by August 2, 2014. Written comments regarding the NOP may be sent to the following:

Ron Kosinski, Deputy District Director
 Division of Environmental Planning
 Caltrans, District 7
 100 South Main Street
 Los Angeles, CA 90012

If you have any questions, contact Dawn Kukla at (213) 897-3616. Thank you for your interest in this important transportation project.

Sincerely,

RON KOSINSKI
 Deputy District Director
 Division of Environmental Planning

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3715
Fax (916) 373-5471
Web Site www.nahc.ca.gov
Ds_nahc@pacbell.net
e-mail: ds_nahc@pacbell.net



July 9, 2014

Ms. Dawn Kukla

California Department of Transportation, District 7

100 South Main Street, MS-16A
Los Angeles, CA 90012

RE: SCH#2014071006 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"SR-710 Surplus Property Sale"** located in the City of Pasadena, Los Angeles County, California

Dear Ms. Kukla:

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

We suggest that this (additional archaeological activity) be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. Any information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People...with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (The California Code is consistent with the Federal Executive Order 12898 regarding 'environmental justice.' Also, applicable to state agencies is Executive Order B-10-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead, lead agencies include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,



Gayle Totton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
Los Angeles County
July 9, 2014**

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Gabrielino Tongva
tattnlaw@gmail.com
(310) 570-6567

Gabrielino-Tongva Tribe
Bernie Acuna, Co-Chairperson
P.O. Box 180
Bonsall, CA 92003
Gabrielino
bacuna1@gabrielinotribe.org
(619) 294-6660 Office
(310) 428-5690 Cell
(760) 636-0854 Fax

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, CA 91778
Gabrielino Tongva
GTTribalcouncil@aol.com
(626) 483-3564 Cell
(626) 286-1262 Fax

Gabrielino-Tongva Tribe
Linda Candelaria, Co-Chairperson
P.O. Box 180
Bonsall, CA 92003
Gabrielino
palmsprings9@yahoo.com
(626) 676-1184 Cell
(760) 636-0854 Fax

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
P.O. Box 86908
Los Angeles, CA 90086
Gabrielino Tongva
sgoad@gabrielino-tongva.com
(951) 845-0443

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA 91723
Gabrielino
gabrielenoindians@yahoo.
(626) 926-4131

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower, CA 90707
Gabrielino Tongva
gtongva@verizon.net
(562) 761-6417 Voice/Fax

Gabrielino-Tongva Tribe
Conrad Acuna,
P.O. Box 180
Bonsall, CA 92003
Gabrielino
(760) 636-0854 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed SR-710 Surplus Property Sale project located in the city of Pasadena, in Los Angeles County, California for which a Native American Contacts list supplemental was requested.

**Native American Contacts
Los Angeles County
July 9, 2014**

Gabrielino /Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908 Gabrielino Tongva
Los Angeles , CA 90086
samdunlap@earthlink.net
(909) 262-9351

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting locative Americans with regard to cultural resources for the proposed SR-710 Surplus Property Sale project located in the city of Pasadena, in Los Angeles County, California for which a Native American Contacts list supplemental was requested.



OFFICE OF THE MAYOR

July 17, 2014

Ron Kosinski *RK*
Caltrans District 7, Division of Environmental Planning
100 S. Main St., Ste. 100
Los Angeles, CA 90012-3606

Dear Mr. Kosinski:

This relates to the notice of preparation for a Draft Environmental Impact Report for the 710 surplus property sale project (File: 07-LA710). We understand the purpose of the NOP includes soliciting input regarding the scope and content of the analysis in the Draft EIR and to identify potential environmental impacts that the Draft will evaluate.

I am writing to affirm a position that has been conveyed in the past regarding the City's expectation about certain improvements that are needed to return the Pasadena Avenue/Saint John Avenue area to its former condition which was compatible with the surrounding neighborhood areas.

In the mid-1970's, Caltrans initiated a supposedly temporary traffic plan along Saint John and Pasadena Avenues which is often referred to as the "wishbone". At that time, to accommodate the perceived needs of the temporary traffic plan, the intersection of Pasadena Avenue at Bellefontaine Street was split into two, concrete sidewalks were removed, parkways and their mature camphor trees were demolished, streets were redesigned as one-way streets, and the intersecting streets of Congress Place, Markham Place and Wigmore Drive were barricaded.

Now, 35 years later, the City expects and requests that these streets will be returned to their original two-way traffic. We look to Caltrans, as it proceeds with the sale of the 710 surplus property, to work with our Department of Public Works to finalize a scope of work that includes roadway resurfacing, sidewalks, street lights, curbs and gutters, planting of designated street trees and other infrastructure improvements, and restoration of the original pattern of streets and blocks at the wishbone which will make the neighborhood "whole" again.

We appreciate this opportunity to offer these comments regarding the expectations of our community and stand ready to respond fully in the event there are questions or other ways in which we might be helpful to you in this important effort. Thank you very much.

Sincerely,

BILL BOGAARD
Mayor

BB:jls

This page intentionally left blank

July 24, 2014

Dear Mr. Kosinski, 

We are writing in response to the recent publication of the Title 21 Public Works Division 2. Department of Transportation Chapter 9.5 Affordable Sales Program. We would like to see some of the guidelines proposed in the document return to the time specifications originally proposed. ie,

Section 1480 Terms of Conditional Offer prior to Sale.

Originally it was defined *"As used in this article. The term "offer" means to solicit proposals prior to sale in a manner calculated to achieve a sale under the conditions specified, and to hold that offer open for a reasonable period of time, which shall be no more than one year, unless the time is extended by the selling agency at its discretion, for a period to be specified by the selling agency"*

1480 section A (new proposal)

You are proposing a 60 day window...this is much too short for a tenant to explore all the financing possibilities in order to acquire a DOT property with the restrictions that are being proposed. Tenant should have up to a year to respond to the offer.

Section 1487, "Upon acceptance, buyer has 90 days to close escrow".

Because of the unique requirements to purchase DOT properties at the low and medium income levels, 90 days is too short of time for tenants to explore all the possibilities for financing. They will need more time and 180 days should be the minimum time to find financing for these properties.

Section 1477 Conditional Offer Prior to Sale

Section 3

"All single family residences shall be offered at an affordable price or fair market value at each buyer's option to present occupants who are in good standing who have occupied the property for five years or more, and whose income does not exceed 150 percent of the area medium income if the present occupants have not had an ownership in real property in the last three years"

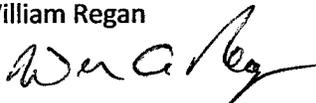
The "area medium income" should be determined by Zip Code as there are vast differences in the area medium income in the DOT properties being released.

Finally we would like to be informed of the original cost of the properties at the time Caltrans purchased them.

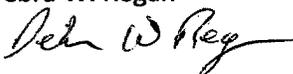
Thank you so much for the opportunity to help craft the details of this program, so that the transition from Caltrans property to private property goes as smoothly as possible.

Best Regards,

William Regan



Debra W. Regan



265 Waverly Drive
Pasadena, Ca 91105
Tenant# 07-049322-0001-08

This page intentionally left blank

July 26, 2014

To: Ron Kosinski, Deputy District Director 
Division of Environment Planning
Caltrans, District 7
100 South Main Street
Los Angeles, CA 90012

From: Wendy Monroy & Joel Alvarez
532 Meridian Ave.
South Pasadena, CA 91030

This letter is in response to the July 2nd letter regarding the 710 Surplus Property Sale Project.

Caltrans has setup a double standard for many tenants like myself. After 1983, Caltrans stopped renting to low-income and actively pursued fair market rents for minimally maintained and many times neglected homes. Today, many of the tenants are of low and moderate-income families and many tenants that are slightly over the 150% of medium-income. This will end in many tenants not being able to buy their homes, evictions by regulations and ironically more trauma on the community.

The Roberti Law has 2 main goals, to provide affordable low and moderate-income housing and second to preserve community. The emphasis 35 years ago was low-income and moderate housing. Today, it has to be both, low and moderate income housing, which is 50% of the tenants and preserving the community, which is the other 50%. Intervention and support is needed so that the communities affected do not suffer another trauma. It would be irrational to implement outdated laws and regulations that do not reflect or address the current situation Caltrans has created.

South Pasadena phase 1A will be the trial product, and what happens to us will happen to the rest. If we have over 50% exodus of tenants in the first twenty homes sold, we can only expect the same exodus in the remaining 400+ homes.

We have listed some of our concerns, comments and suggestions.

A. The Spirit and Intent of the Roberti Law and APA Law.

Our proposal is based on the Roberti Law's spirit of providing affordable housing and in not only mitigating (alleviating) the environmental impact (the damage done to communities by the initial acquisition of the 710 Corridor houses) but in making sure that the 3 communities affected by that initial purchase do not suffer any additional trauma and destruction.

Our proposal is also based on the fact that, as renters, we are major stakeholders on the sale of our homes. We tenants, have a right to a comment period that would

allow us **meaningful participation throughout this entire process**. We partly base this right on the Administrative Procedure Act (APA) current law, that was designed to guarantee, the public meaningful participation. The APA law was established with the following stated reasons:

- 11340-11342.4 The language of many regulations is frequently unclear and unnecessarily complex... The language is often confusing to the persons who must comply with the regulations.
- The complexity and lack of clarity in many regulations put small businesses, [the public] which do not have the resources to hire experts to assist them, at a distinct disadvantage.

A 45-day comment period is the minimum required by law, but is not enough in our situation. To develop a responsible alternative to the proposed regulations without the help of lawyers we need minimally 75 more days (120 days total). Caltrans' refusal to reconsider this request so far can be seen as not only discriminatory but it is in violation of the APA (Administrative Procedure Act) intent and unconstitutional.

This proposal is a draft proposal that needs more attention and development- therefore an additional 75-day extension is warranted.

B. The State of California is not a for Profit Corporation: We also base our proposals on the common notion and fact that the State of California was created by the people to insure an equitable distribution of resources and to allow for the meaningful participation of civil society in the state's decision making process. As a non-profit State we hold to the Constitutionally based nature and the Attorney Generals' opinion that dictates that the State of California should not make a profit off of these sales. While we understand that we, the people, the taxpayer, already paid for these houses, we also understand that we benefited as well as contributed in the caretaking of these properties as tenants/caretakers. Given this perspective we offer the following:

1. To be able to plan on the purchase the tenants need to know the Original Housing Purchase Price (OHPP). We propose that Caltrans immediately make the OHPP be published and made public.
2. Relating to the purchase price, Caltrans should credit all rent previously paid and offset that full amount-50% against the purchase price, which should be the original purchase price that Caltrans paid to initially acquire the property.
3. Relating to the purchase price, Caltrans should credit all rent previously paid and offset that full amount-50% against the current purchase price, which should not exceed the original purchase price that Caltrans paid to initially acquire the property. If the amount that is credited to the purchase

price exceeds the amount of the purchase price, we acknowledge that CalTrans would not owe tenants anything.

C. On Current Priority Rights

1. That in all cases of tenants with more than 2 years, that the priority to right of refusal go first to the current tenant. If the tenant has less than 2 years, that the previous tenant that left in Good Standing have the seniority right and be given the right of first refusal. That those tenants with less than 2 years be given an opportunity to purchase one of the tenantless surplus properties before it is offered to non-profits or auction but only after the offered to FTIGS Former Tenants in Good Standing.

2. All options to purchase should be offered at no more than Original Housing Purchase Price (OHPP) paid for by CalTrans adjusted for inflation (Rule 72) and no less than the Original Housing Purchase Price (OHPP) paid for by CalTrans.

D. On 30 year Covenants

1. No to all covenants. Rationale: The Caltrans homes on the 710 Corridor have been under Caltrans control for almost 50 years. During that time, Caltrans has **not** maintained most of these houses and because of that neglect most have serious damage are in a deteriorated condition. Under these conditions even without additional restrictions it is going to be difficult to obtain financing for the purchase of these houses. Many of the tenants on the Corridor have been in their homes many years and are near retirement. These restriction have become onerous covenants will make it even more difficult to obtain a loan and that will further frustrate the intent of the Roberti Law.

E. On The Right of Family Co-signers

1. Extended family members, regardless of income, not currently residing in the home can purchase the home for their family member who is residing in the home on their behalf.

F. On Conditional Offer Prior to Sale

1. Cross apply 3A. Rationale: Remove condition because it unfairly discriminates against seniors who may have purchased retirement properties, those who have inherited property no matter how small the property interest, those who had property interests and lost them and other special circumstances. For example, those who have property that is upside down.

2. Caltrans needs to provide tenants with documents that fully detail and explain the 2014 LA County Median Income stipulations. Can it be prorated to reflect the COLA that will show up in next year's charts?

(1) What is an income qualified buyer? See CCR Title 25, section 6910

(2) Fair Market Value – What goes into this? How is Fair Market Calculated and What properties are compared to calculate the Fair Market Value? Clarify?

(3) Define reasonable price? Why will Fair Market Value be used for single family buyers, but “REASONABLE Price” for public private entities?

G. On those over the 150% Median Income

1. That tenants falling into the “Over the 150% Median Income” category in the Prospective Buyer in Priority Order list be moved from Number 5 to number 4 and Number 4 becoming Number 5 on the list. These tenants should have an opportunity to purchase a home outright from Caltrans and not have to deal with any designated public or private affordable housing organizations. These tenants should be offered to buy at the same costs indicated above. Cross apply 4.B. [All options to purchase should be offered at no more than Original Housing Purchase Price (OHPP) paid for by Cal Tranz adjusted for inflation (Rule 72) and no less than the Original Housing Purchase Price (OHPP) paid for by Cal Tranz.]

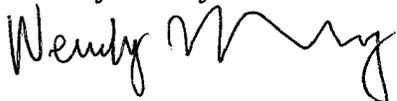
2. If necessary, Caltrans should enact emergency regulations if this is what's needed to accomplish this adjustment.

H. Relocation Assistance

1. Tenants who need to vacate due to sale of the property ought to receive a 120 day notice to vacate and not be required to pay for rent while they seek alternative housing in addition to receiving the maximum, or in excess of maximum limits, statutory stipends and other benefits contained in the Federal Relocation Assistance Program. They should also be relocated to available Caltrans housing available (or made available for this purpose).

2. Available Federal Relocation Assistance Program benefits ought to be provided for tenants as needed and based on eligibility.

Thank you for your consideration.



Wendy Monroy & Joel Alvarez

323-270-5021

John Kvammen
696 South Saint John Avenue
Pasadena, CA 91105

July 26, 2014

Ron Kosinski *LK*
Deputy District Director
Division of Environmental Planning
District 7
Department of Transportation
100 South Main Street
Los Angeles, CA 90012

Dear Mr. Kosinski:

I believe Caltrans conducting a Draft EIR for the 710 Surplus Property Sale Project is not necessary, is not required by law, and is a waste of tax payer dollars. If the focus of this EIR was solely to study the positive impact to the neighborhood of restoring Saint John Avenue to its original use as a two way residential street, dismantling the "fork in the road" and returning this area to its original "T" intersection, and restoring the front yards on the east side of Pasadena Avenue to their original dimensions, I would see a possible requirement. Any focus on the properties collectively or individually is misguided.

CEQA does not apply to the sale of surplus properties. The sale of property is categorically exempt from the California Environmental Quality Act (CEQA). See Public Resources Code sections 21010 (b), 21159.23, 21159.24, etc., and state CEQA Guidelines at sections 15300 to 15332. There is no new construction contemplated. All historic properties will be preserved: none will be moved. The sale of existing residences is not even a "project" under CEQA. The goal is to preserve housing and neighborhoods. There is no environmental impact from keeping things the way they already exist. Early in the process Caltrans needs to approve a formal determination of a categorical exemption from CEQA as to all of these future sales and file the exemption with the appropriate entities.

As the lack of requirement for this EIR is so clear, it seems like Caltrans is just creating work for itself. As a taxpayer I object to the waste of money. As a Tenant in the 710 Corridor, I object to any delay to the swift sales of these properties.

Yours truly,



This page intentionally left blank

Deputy District Director
Ron Kosinski
Division of Environmental Planning
Caltrans, District 7
100 South Main Street
Los Angeles, CA 90012

Pasadena, July 27, 2014

In reply to NOP solicitation regarding environmental impacts to be evaluated by Draft EIR:

The by Caltrans proposed 710 Surplus Property Sale Project has by myself been anticipated for 48 years, the span of my rental.

It is well known that Caltrans has not been able to maintain and keep their rental properties up to par with the California Safety Codes and Standards

With the proposed sale there seemed hope for a betterment of these conditions when the properties will be taken care of by new owners, the people who care for their rentals.

However due to the way Caltrans is misinterpreting the Roberti Bill and thereby making it impossible for the majority of the present tenants to purchase their rented homes, the future for our communities looks bleak.

There will be an avalanche of present renters leaving their homes!

This will have a negative impact on the neighborhoods. Resulting in a decline of property values, safety for the areas and a deterioration of life quality for the property owners left in the areas

It would benefit Caltrans to be the Agency who cares and wants to do the right things for our neighborhoods. There is still a chance for Caltrans to become respected for their smart judgements in their choice to make it possible for the present tenants to purchase their rented properties.

Best regards



Brigitte Bergman
215 Wigmore Dr
Pasadena, CA 91105
626 441 4196

This page intentionally left blank

July 30, 2014

Jim and Connie Haddad
270 and 244 Arlington Drive
Pasadena, CA 91105

Ron Kosinski 
Deputy District Director
Division of Environmental Planning
Caltrans, District 7
100 South Main Street
Los Angeles, CA 90012

Dear Sir:

As the owners of a property listed in the National Register as an Historic Place, and also as owners of property taken by eminent domain years ago for the construction of the 710 freeway, we are, of course, very concerned about all present and potential environmental impacts from whatever is done in our area. Like almost everyone in or near the path of the proposed 710 corridor, we don't want any increase in traffic and are worried about environmental hazards from the proposed tunnel.

We don't know where the trucks are traveling now, but they are not going up and down Pasadena Avenue, and we are opposed to any plans to route them through our area in a tunnel. In fact, we don't want the tunnel with or without trucks. We envision a variety of hazards from pollution and accidents.

It seems that if the human species is going to survive on this planet, our focus should be entirely on reducing pollution: no increase in vehicular traffic; get people out of their cars and into public transportation and get the trucks off of the road and ship by train instead.

These massive projects take so long and cost so much that they will very possibly be outdated by the time they are completed.

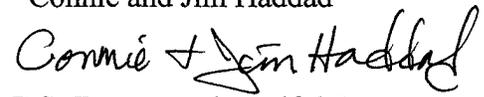
Caltrans has turned a once lovely neighborhood into a blighted area. How about taking a tiny minuscule of the money you think of spending on great big projects to fix the blight you have created. Just landscape the treelawns (a.k.a) parkways along Pasadena Ave. They are weedy, trashy eyesores. And landscape the two parcels you are holding on the southeast and southwest corners of Bellefontaine and Pasadena Avenue. Apparently the City landscaped the large parcel in the center of the road between those two parcels.

We are all for your selling back surplus properties and would like it to be done in a fair, compassionate way. If a 90-year-old has been living in one of your houses, will they not be able to buy it because they can't give a 30 year guarantee? We have been waiting

decades for our family property to be returned to us, and hope we won't die before you get around to us.

Sincerely yours,

Connie and Jim Haddad

A handwritten signature in cursive script that reads "Connie + Jim Haddad". The signature is written in black ink and is positioned below the typed names.

P.S. To see our beautiful Japanese garden, of which you hold an integral piece, see our website: japanesegardenpasadena.com

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



July 31 2014

Dawn Kukla
Senior Environmental Planner
California Department of Transportation
District 7
100 South Main St., MS-16A
Los Angeles, CA 90012

RE: SR-710 Surplus Property Sale, NOP, California Department of Transportation, SCH# 2014071006

Dear Ms. Kukla:

We thank you for the opportunity to comment on the above Notice of Preparation (NOP) for the SR-710 Surplus Property Sale (Project) issued under the California Environmental Quality Act (CEQA) for the California Department of Transportation (Caltrans).

The State Office of Historic Preservation (OHP) has broad responsibility for the implementation of federal and state historic preservation programs in California. The OHP reviewed the above-referenced document, and we have the following specific comments.

Caltrans is proposing to sell surplus properties which were originally acquired for a surface freeway project on State Route (SR) 710 in the cities of Los Angeles, Pasadena, and South Pasadena, in Los Angeles County. Some of the properties to be surplussed are listed or eligible for listing on the National Register of Historic Places (National Register) the California Register of Historical Resources (California Register) and/or designated as locally significant.

My staff contacted you on July 25, 2014 (e-mail Michelle C. Messinger to Dawn Kukla) and requested a copy of the Initial Study (IS), which was not circulated with the NOP. You shared with us that Caltrans did not prepare an IS because it was known that the proposed action has the potential to impact significant historical resources and therefore an Environmental Impact Report (EIR) would be required.

My recommendations for the EIR are as follows.

Caltrans should consider the full range of historical resources pursuant to CEQA Guidelines §15064.5 when determining the impacts of the proposed Project in order to fully identify all potential historical resources and develop adequate and feasible mitigation measures. All properties should be evaluated for the California Register as well as the National Register.

Moreover, Caltrans has to determine whether any of the surplus properties constitute a historical district for purposes of CEQA. If there are historical districts within the project area, the EIR must thoroughly examine the Project's potential effects on those districts and their contributors.

Mr. Dawn Kukla

July 31, 2014

Page 2 of 2

Pursuant to § 15126.4 Caltrans has to develop adequate mitigation measures to minimize the significant adverse effects resulting from the proposed Project. It is my recommendation that Caltrans adopt covenants for all historical resources listed in or determined eligible for the National Register and or the California Register and all historical resources determined significant under a local ordinance to mitigate adverse effects from the Project.

Thank you for considering historical resources as part of project planning. I look forward to reviewing the Draft EIR.

If you have any questions or concerns, please don't hesitate to contact Michelle C. Messinger, State Historian II on my staff at (916) 445-7705 or at Michelle.Messinger@parks.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Carol Roland-Nawi, Ph.D." The signature is written in a cursive style.

Carol Roland-Nawi, PhD
State Historic Preservation Officer

CC: Gloria Scott, Senior Environmental Planner, Caltrans HQ



Ron Kosinski, Deputy District Director *RK GD*
Division of Environmental Planning
Caltrans, District 7
100 S. Main Street, MS 16A
Los Angeles, CA 90012

RE: 710 Surplus Property Sale
VIA CERTIFIED MAIL

July 31, 2014

Dear Mr. Kosinski:

On behalf of the Sequoyah School community of students, faculty, parents, alumni, past parents, trustees and friends, this letter is written in response to the Notice of Preparation for a Draft Environmental Impact Report (EIR) for the 710 Surplus Property Sale Project.

The Sequoyah community believes that the following potential environmental impacts should be addressed in the Draft EIR.

Current Uses –Social and Economic Impacts: The proposed sales will take place within vital established communities. Sequoyah School, along with other schools, convalescent homes, and community gardens, is one of many non-profit institutions situated in the SR-710 corridor that provide valuable and essential services to the citizens of Pasadena and surrounding regions. Established for-profit businesses and institutions in the SR-710 corridor also provide valuable community services. The Draft EIR should address what impact any closure, temporary suspension or relocation of such established institutions and businesses caused by forthcoming sales may have on the communities those institutions and businesses serve. The Draft EIR should also evaluate how current businesses and institutions in the SR-710 corridor might be affected by various sales process alternatives and timelines. Furthermore, the Draft EIR should consider the availability and accessibility of information related to any contemplated sales process.

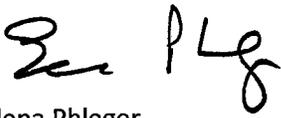
Historic Properties: The SR -710 corridor traverses neighborhoods with significant historic properties. The Draft EIR scope should include analysis of potential impacts caused by the sales of historically significant or aesthetically important properties. Eventual sales could either jeopardize or encourage ownership by responsible stewards of historic properties. It is our view that priority in the sales process should be extended to current non-residential tenants in good standing who have invested significant resources in preservation of buildings and grounds, and who have over many years worked closely with Caltrans and the State Historic Properties Officer to conserve and improve individual historic properties. Analysis should focus on the continued preservation of historic sites and the revitalization of neglected buildings, sidewalks and streets.

Community Fabric/Open Space: The Draft EIR should address the potential impacts of transferring properties to owners who intend to develop sites into higher density uses. Higher density uses may result in increased traffic congestion on city streets, less open space within existing neighborhoods and the removal of mature trees. The SR-710 corridor, and the non-profit institutions and businesses that currently comprise it, represent an important part of the fabric of our city. The Draft EIR should consider the importance to the community of maintaining this valued status quo.

Finally, would you please send copies of all public notices associated with SR 710 Sales Project and its EIR to me at the address below?

Please do not hesitate to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elena Phleger'.

Elena Phleger
Director of Development and Communications
Sequoyah School
535 S. Pasadena Avenue
Pasadena, CA 91105
ephleger@sequoyahschool.org
626-795-4351 x 215

cc: Claire Bogaard
Steve Madison
Carol Liu

August 1, 2014

To: Ron Kosinski
Deputy District Director
District 7, Division of Environmental Planning
100 South Main Street, Suite 100
Los Angeles, Ca. 90012-3606

From: Marie Ibsen Risigari-Gai and United Cal Trans Tenants
534 Orange Grove Ave.
South Pasadena, Ca. 91030

Dear Mr. Kosinski,

I am writing to you in response to a letter that I received from your office requesting input for the Environmental Impact Report regarding the 710 Surplus Property Sale Project. There are many impacts, particularly social impacts, to the communities that are of great concern to both the cities involved and the Cal Trans Tenants. I am one of those tenants and I have come together with many of my Cal Trans neighbors to discuss our plight. Many of us are long-term tenants who have lived in our homes for 15 years or more. We are an established part of the fabric of our communities. We have raised our families in these communities and our younger Cal Trans neighbors are just beginning to put down roots to raise their families and have children attending the local schools. We are very worried about what will happen to us as this sale progresses and what will happen to the communities that we call home as they are changed through new ownership and public and non-profit housing projects.

The spirit of the Roberti Bill is to preserve neighborhoods and communities. The cities of South Pasadena, Pasadena and El Sereno area of Los Angeles have been ravaged by the prospects of the 710 Freeway Project for more than half a century, but during this time, the Cal Trans Tenants have tried to be contributing members and good stewards of the properties despite the restrictions and lack of upkeep and maintenance by the Department of Transportation. Because of the Roberti Bill, many of the current tenants find themselves outside of the Affordable Program because of income and the tenants who qualify for the Affordable Program find themselves without the ability to find financing that would accommodate the covenants placed on the sales of the property by Cal Trans and the Roberti Bill. This is a dilemma and is causing serious social and emotional hardship to all of the Cal Trans Tenants. The Sale of the 710 Surplus Property is just beginning and a list of the first 52 properties to be sold has been posted and those tenants have been notified that this event is coming and coming quickly. It is a like standing on quicksand. We are waiting for the sales date but have no timeline, potential purchase price, or procedures for determining the price of the home. We are told

that it is our responsibility to find financing but do not have any details to work with and at the same time told that the turn around time will be short, 30 days. Uprooting us will create social and emotional hardship because we really do not know where we will go. It is stressing everyone, particularly our senior tenants who are on fixed income or are about to retire. The social impact of this sale in its present state is adverse.

The spirit of the Roberti Bill is to provide affordable housing and preserve communities. Without providing additional assistance to the current Cal Trans Tenants to help them to remain in their homes regardless of income status, age, or length of tenancy, the community fabric in these cities will feel a negative impact. Rethinking both the legislation and the order of purchase will help the Cal Trans Tenants to remain in their homes and to continue to be contributing members of their communities. Lack of intervention on their behalf will lead to mass evictions and refugee like conditions for the tenants who are forced out of their homes. There is no plan in place to help the tenants relocate to comparable homes in the cities they call home. Allowing non-profit groups to have priority over the current tenants to purchase the homes will not benefit the communities socially. Investment in the Cal Trans Tenants to help us to gain home ownership will contribute to the preservation of the neighborhoods and the community that is at the heart of the Spirit of the Roberti Bill.

Sincerely,



Marie Ibsen Risigari-Gai and United Cal Trans Tenants

Ron Kosinski, Deputy District Director 
Division of Environmental Planning
Caltrans, District 7
100 S. Main St,
Los Angeles, CA90012

August 2, 2014

Re: Response to your solicitation of comments for study
for a Draft Environmental impact Report for the 710 Surplus Property Sale
Project

Dear Mr. Kosinski;

Thank you for the opportunity to reply to your solicitation of
issues to study for a Draft EIR report on the sale of the 710 Corridor surplus
properties. My house is among the first to be offered for sale and I have
certain concerns of interest to me personally and I believe to my community
of South Pasadena as well.

In South Pasadena, Neighborhood Blight Will Continue:

After studying the references to the law upon which the proposed
Caltrans regulations for sale of these homes are based, it is clear that under
current Caltrans regulations for the sale of these surplus homes, the
community in South Pasadena will continue to suffer from many of the same
blight causing constant complaints from the neighborhoods in which these
homes are located : disheveled curb appearance, lack of maintenance,
dangerous fire hazards, unkempt landscaping, and that property values and
the community will not be enhanced as they would be if tenant home
ownership were facilitated.

The reason is that the priorities list proposed by Caltrans for home
purchase opens very early on, in current slot 4, the possibility for a private,
for profit investor, called an "Eligible Sponsor", as defined under Health and
Safety Code of the California Code of Regulations, title 25, div 1, chap 7,
subchapter 4, Sections 7300-7303. This entity or investor or investment
group "shall be organized on a *for-profit*, including limited profit, or non-
profit basis." They need not have affordable housing experience but can hire
a management company experienced in affordable housing issues to set up
the affordable housing for the investors. Since they can be for profit, yet in
an affordable situation, they will naturally not be inclined to enhance the

property more than the minimum required by FHA habitability standards which are very minimal, and similar to what Caltrans has been doing for these last decades. This will continue the neighborhoods in a depressed state, by keeping the houses in a depressed state to the detriment of the community, the neighborhood and the City as a whole.

The regulations as specified above invite many more Esperanza type situations to the detriment of the tenants and the City of South Pasadena. To whom it could potentially prove a costly matter.

**The Regulations encourage the conversion of
Single Family Homes into Multi Family Dwellings in South Pasadena.
Increasing congestion, further strains city resources, and detracts from
the character of the City
Loss of home enhancements due to Home ownership of former tenants:**

Some of the homes for sale in South Pasadena come with substantial land square footage and are in Residential Medium Density zones. That is the case of my property which is zoned for a second contiguous dwelling unit; this could be built as part of the "development and rehabilitation" that private housing entities are encouraged to do under the regulations Caltrans Has furnished for this sale.

Also, another addition third or even 4th unit could be added on under the state-wide so-called "second unit" legislations (AB1866) passed in California in 1989 and which is being implemented in California through the Department of Housing and Community Development. In South Pasadena the Planning Commission approved conformity to this 2nd unit law in April of 2013. This allows for the construction of an adjunct smaller living unit to established single family homes on the same property.

Thus, by not allowing all tenants regardless of economic status, to opt for their homes before turning the process over to private and public housing authorities, the cities involved, South Pasadena, Pasadena and Los Angeles will lose the enhancement of their cities through an increase in enhanced homes due to the pride of home ownership of the former tenants...

Destruction of Trees and plants due to construction of multi family dwellings on formerly single family plots.

In the case of my property, and others, this construction would involve the destruction of potentially 5 to 7 established trees on the property.

Displaced Elderly and others forced to leave homes and community-- a social and economic loss to the communities:

The human cost, many Elderly will be displaced from their homes and communities of many years as they will not be able to get financing on a fixed income, and may not be allowed to stay in their homes under new private housing regimens. Although they are supposed to maintain an affordable status, it is clear that prices have to rise somehow for owners who have just bought these homes.

Others will be considered not in the current affordable range and will be not qualify to stay in their homes. This goes counter to the intent of the Roberti Bill on the sale of the houses is to reintegrate community and to reinforce community bonds. People who feel close to their community support their community politically, socially and economically. The loss of so many people integral to the community for decades upon decades will be a personal and financial loss to these tenants, and a social and political and economic loss to the City of South Pasadena, and the Community of El Sereno.

Many people will be displaced from their homes of many years. The fabric of community will be torn. This is the exact problem Roberti was trying to mend. And those Caltrans regulations could be implementing, if they were to aid in the effort to change the rules to allow all tenants the ability to buy their homes before any housing entity, public or private.

With the Priorities as now listed, allowing Private and public housing entities to buy homes before all tenants regardless of affordability ranking are offered their homes; speculation will be rampant in South Pasadena.

There will be no shortage of Private Investor Money Searching to Buy the Caltrans homes

If the tenants are not found to qualify because they are beyond 150% of the median income, the regulations specify that private investors can buy our homes at a 'reasonable' price. This is a negotiated price based on the investor's available money and market pressures, such as other potential offers, for example...

The Los Angeles Times recently wrote, and as other real estate commentators have reported, that the San Gabriel Valley has a very high percentage of cash home purchases, and foreign home purchases in the San Gabriel Valley is up 35% from 2013, as the wealthy from abroad look for places to invest their money against instability at home. So there will be no shortage of private investors with large "reasonable" amounts of money to invest in the homes of long time tenants in South Pasadena and where values are always pushing upwards. Without a change in the rules allowing all tenants the right to be offered their homes BEFORE any Private or public housing entity, there is going to be a massive displacement of mainly older long term tenants from the community who will be forced out of their homes, by increased rents raised by new owners through new fees and other income concepts, or displacement for very long periods for "development and rehabilitation" of the homes according to the new owners requirements.

This will be potentially very costly to the State, and will cause great friction between Caltrans and the tenants.

Asbestos, Asphalt and Railroad Dump, need environmental inspection.

It turns out that this area, including my block - the 1100 block of Grevelia Street - was a parking lot, site of offices of, and the dump for the Santa Fe Railroad which came through South Pasadena until the 1970's.

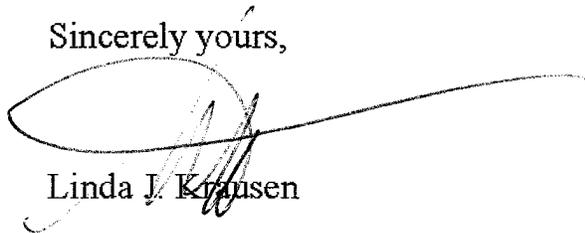
That is why 3/4 of my whole back yard is asphalted. And why I keep finding broken bottles and other debris in the earth that is there. On one whole section of the 1/4 of land that is dirt nothing at all will grow. Why is that? Is there still industrial waste on my property? Part of my house has asbestos flooring. What else is out there as a result of this former dump and parking lot history of 1109 Grevelia and the other 3 properties that are or were

Caltrans on the 1000 block of Grevelia, and on reported other properties on Orange Grove as well?

I hope this letter provides input regarding the scope and content of the analysis in the Draft EIR and helps to identify potential environmental impacts the EIR will evaluate, particularly the impacts on the communities in which we the Caltrans tenants live.

Thank you for this opportunity to contribute on this issue.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Linda J. Krausen", is written over a large, light-colored oval scribble. The signature is fluid and cursive.

1109 Grevelia St.

South Pasadena, Ca 91030

This page intentionally left blank

Kukla, Dawn E@DOT

From: Kukla, Dawn E@DOT
Sent: Wednesday, September 03, 2014 1:15 PM
To: Linda Krausen [ljkrausen@sbcglobal.net]
Subject: 710 NOP Comment Letter

Hi Linda,

My name is Dawn Kukla and I work for Ron Kosinski in Environmental Planning. He wanted me to follow up with you in regards to your 9/1/14 email. I want to assure you that our office has received your comment letter and your comments will be included in the EIR. Additionally, I would like to apologize for the late return receipt but please be assured that the delay in returning the return receipt was an oversight on our part and will not affect your comment letter submittal.

If you have any other questions or concerns please feel free to contact me.

Thank you,

Dawn Kukla
Senior Environmental Planner
Division of Environmental Planning
(213) 897-3643

This page intentionally left blank

Kukla, Dawn E@DOT

From: Kosinski, Ron J@DOT
Sent: Wednesday, September 03, 2014 12:13 PM
To: Damrath, Garrett K@DOT
Cc: Kukla, Dawn E@DOT
Subject: FW: EIR environmental report omments due Aug 2. 2014
Attachments: Ron Kosinski resent 9-2-14.doc

I assume we have her comments & will address them in the EIR - if so let her know please

From: Linda Krausen [<mailto:ljkrausen@sbcglobal.net>]
Sent: Wednesday, September 03, 2014 12:04 PM
To: Kosinski, Ron J@DOT
Subject: Fw: EIR environmental report omments due Aug 2. 2014

The 2nd of September I received the Return Receipt Requested postcard I referred to in the email of yesterday. It was sent Aug 2, on time, but the return postcard states that it was received at Cal Trans and signed for on 8-28, almost a month later. I do hope that in spite of this, the postmark counts and that my comments were included in the discussion of the EIR referenced in your request.

Thank you,
Linda Krausen
1109 Grevelia St.
South Pasadena, CA, 91030

On Monday, September 1, 2014 4:37 PM, Linda Krausen <ljkrausen@sbcglobal.net> wrote:

Dear Mr. Kosinski,

Just a questions about the above mentioned comments.

I sent my comments via email to your mailbox on the date due, and also via US Mail Certified and Return Receipt Requested.

I did receive an automatic email in return referring me to 897-0791 , but I have not received as yet the Return Receipt Requested postcard confirming that the certified letter was received. Is there any way I could get written confirmation just that my comments were officially received either via USPS or via Email? It's just for my records.

Thanks,
Linda Krausen
1109 Grevelia st.
South Pasadena, CA

This page intentionally left blank

LUCETTA DUNN, Chair
BOB ALVARADO, Vice Chair
DARIUS ASSEMI
YVONNE B. BURKE
JAMES EARP
DARIO FROMMER
JAMES C. GHIELMETTI
CARL GUARDINO
FRAN INMAN
JAMES MADAFFER
JOSEPH TAVAGLIONE

STATE OF CALIFORNIA

EDMUND G. BROWN Jr., Governor



SENATOR JIM BEALL, Ex Officio
ASSEMBLY MEMBER JIM FRAZIER, Ex Officio

Will Kempton, Executive Director

CALIFORNIA TRANSPORTATION COMMISSION

1120 N STREET, MS-52
SACRAMENTO, CA 95814
P. O. BOX 942873
SACRAMENTO, CA 94273-0001
FAX (916) 653-2134
(916) 654-4245
<http://www.catc.ca.gov>

April 2, 2015

Ms. Dawn Kukla
California Department of Transportation
100 S Main Street MS 16A
Los Angeles, CA 90012

RE: Notice of Preparation of a Draft Environmental Impact Report: SR-710 Surplus Property Sale

Dear Ms. Kukla,

On February 18, 2015, a Notice of Preparation dated June 27, 2014 that a Draft Environmental Impact Report will be prepared for the SR-710 surplus property sale was received by the California Transportation Commission (CTC).

The CTC's statutory responsibilities in connection with the sale of surplus highway property are vested in Streets and Highways Code (S&HC) Section 118. S&HC Section 118(a) allows Caltrans to sell real property or interest therein in the manner and upon terms, standards, and conditions established by the CTC. S&HC Section 118(b) requires that any conveyance of highway property shall be approved by the CTC. Further, Government Code Section 54235 – 54238.7 (Roberti Law) allows for sale of SR-710 surplus properties at less than fair market value to persons and families of low or moderate income to mitigate the environmental effects, within the meaning of Article XIX, of the California Constitution, caused by highway activities.

The CTC has no comments with respect to the project's purpose and need, the alternatives to be studied, and the evaluation methods used. As to the impacts to be evaluated, the CTC recommends that community impacts and environmental mitigation within the meaning of Article XIX of the California Constitution should be evaluated. If actions under the purview of the CTC are anticipated, notification should be provided to the CTC as a Responsible Agency. Consideration of the environmental impacts of a project are required prior to the CTC's

allocation of funds for design, right of way or construction activities as well as for new public road connections, route adoptions and surplus highway property conveyances.

If you have any questions, please contact Stephen Maller at (916) 653-2070.

Sincerely,

A handwritten signature in blue ink that reads "Will Kempton" followed by a long horizontal line.

WILL KEMPTON
Executive Director

c: Katrina Pierce, Chief, Caltrans Division of Environmental Analysis

Appendix J SHPO Concurrence

This page intentionally left blank

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



July 28, 2016

VIA EMAIL Kelly.ewing-toledo@dot.ca.gov

In reply refer to: CATRA_2014_0709_001

Kelly Ewing-Toledo
Historic Resources Coordinator
California Department of Transportation
District 7, Los Angeles
Los Angeles, CA 90012-3606

Subject: Proposed Transfer of 113 Excess Parcels in Pasadena, South Pasadena and Los Angeles, Route 710 Historic Houses under Public Resources Code §5024 and 5024.5

Dear Ms. Ewing-Toledo

Thank you for continuing consultation regarding the effect of the proposed transfer of 113 parcels in Pasadena, South Pasadena, and Los Angeles. All of these properties are listed in or have been determined eligible for inclusion in the National Register of Historic Places and/or historical resources for purposes of CEQA.

Pursuant to PRC 5024 and 5024.5 and Stipulation X.B. of the *Memorandum of Understanding between the California Department of Transportation and the California State Historic Preservation Officer Regarding Compliance with Public Resources Code 5024 and Governor's Executive Order W-26-92*, Caltrans has determined that there will be no adverse effect/no substantial change for the historical resources within the Project Area Limits because the properties will be transferred with protective covenants/easements and/or because the properties are within local jurisdictions that are Certified Local Governments that have responsibilities under their municipal codes to protect locally designated historic properties.

The California State Historic Preservation Officer concurs with the finding of no adverse effect with the following condition:

Prior to the sale of previously identified properties requiring additional protection, Caltrans will prepare in consultation with historic preservation entities, covenants/easements for those properties. Draft covenants will be submitted to SHO for review and approval prior to being finalized. If any party is in disagreement regarding the covenants/easements, Caltrans will first consult under Stipulation S.2.c

Ms. Ewing –Toledo

July 28, 2016

Page 2

to resolve disagreement. Further disagreement or objections will be addressed in accordance with Stipulation X.F.

If you have questions, please do not hesitate to contact Natalie Lindquist, State Historian II, at (916) 445-7014 or at Natalie.lindquist@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer

Appendix K CEQA Checklist

This page intentionally left blank

CEQA Environmental Checklist

07-LA-710

N/A

0R000

Dist.-Co.-Rte.

P.M/P.M.

E.A.

This checklist identifies physical, biological, social and economic factors that might be affected by the proposed project. In many cases, background studies performed in connection with the projects indicate no impacts. A NO IMPACT answer in the last column reflects this determination. Where there is a need for clarifying discussion, the discussion is included either following the applicable section of the checklist or is within the body of the environmental document itself. The words “significant” and “significance” used throughout the following checklist are related to CEQA, not NEPA, impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
I. AESTHETICS: Would the project:				
a) Have a substantial adverse effect on a scenic vista	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IV. BIOLOGICAL RESOURCES: Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V. CULTURAL RESOURCES: Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
It is expected that Measures CR-1 and CR-2 will avoid potentially substantial adverse changes in the significance of a historical resource as defined in §15064.5				
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VI. GEOLOGY AND SOILS: Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

VII. GREENHOUSE GAS EMISSIONS: Would the project:

- a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

An assessment of the greenhouse gas emissions and climate change is included in the body of environmental document. While Caltrans has included this good faith effort in order to provide the public and decision-makers as much information as possible about the project, it is Caltrans determination that in the absence of further regulatory or scientific information related to GHG emissions and CEQA significance, it is too speculative to make a significance determination regarding the project's direct and indirect impact with respect to climate change.

VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IX. HYDROLOGY AND WATER QUALITY: Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. LAND USE AND PLANNING: Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XI. MINERAL RESOURCES: Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XII. NOISE: Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIII. POPULATION AND HOUSING: Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XIV. PUBLIC SERVICES:				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XV. RECREATION:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC: Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XVII. UTILITIES AND SERVICE SYSTEMS: Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

This page intentionally left blank