

**Lowden, Jennifer S@DOT**

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**From:** Roberto Flores [REDACTED]  
**Sent:** Friday, July 11, 2014 4:30 PM  
**To:** Affordable Sales Program@DOT  
**Cc:** Hugo Garcia  
**Subject:** Formal Notification of Need for 65-day additional Extension for the Regulation Setting Comment Period  
**Attachments:** UCT formal request for 120 day extension.docx

Mr. Brent Green, attached you will find a formal request for a 120-day comment period on regulation setting.

thank you,

Hugo Garcia and Roberto Flores for United Caltrans Tenants

**UNITED CALTRANS TENANTS  
(UCT-EL SERENO)**

July 11, 2014

Brent L. Green ☐ 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: Caltrans SR-710 Surplus Properties Sales Dear

Dear Mr. Green:

The United Caltrans Tenants (UCT) organization is sending this notice to Caltrans to formally call for an extension of the review and public comment period on the proposed rules and regulations for the Affordable Sales Program. We would like to see the comment extended from the current 45-day period to 120 days. We ask for this extension in the spirit of the Roberti Law and with all its intent and purpose of protecting our communities from further destruction and trauma. UCT has heard, unofficially, that an extension to July 31, 2014 has been approved, however that information has not been communicated to the El Sereno community and Caltrans tenants.

We, as renters, are major stakeholders on the sale of our homes. We have a right to a comment period that would allow us **meaningful participation**.

The APA law was established with the following stated reasons:

*"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.11340-11342.4"*

Caltrans residents from El Sereno, in particular, are at a disadvantage for the following reasons:

- UCT tenants in El Sereno do not have the resources that tenants from other affected cities have, more specifically, legal representation, active support

from their elected officials and generally a higher level of financial support from their community due to their overall financial wherewithal.

- Working class Caltrans tenants from El Sereno (UCT) are forced to rely on their own resources to research these substantial proposed regulations and formulate responses. Because of this it takes longer for us than South Pasadena and Pasadena residents to do so.

If Caltrans insists on imposing the unrealistic and minimum timeline for public comment, instead of allowing for a longer period - when they have the means to do so, Caltrans will be guilty of choosing to ignore clear and conscientious reasons for adjusting the timeline and thereby willfully participating in institutional class discrimination against the community of El Sereno due to the resulting lack of effective and meaningful participation for the El Sereno community.

UCT is prepared to seek legal recourse if not granted the extension to 120 days.

We would appreciate a prompt response to our request – just as you provided to South Pasadena.

Regards,

Hugo Garcia  
UCT – El Sereno  
(323) 512-1000

Roberto Flores  
UCT – South Pasadena

*"La Union Hace La Fuerza"*