

From: [Elena Phleger](#)
To: [Affordable Sales Program@DOT](mailto:Affordable_Sales_Program@DOT)
Subject: Notice of Proposed Rulemaking-Comment
Date: Friday, April 10, 2015 4:09:55 PM
Attachments: [Caltrans Sale Process- Comment 4-2015.pdf](#)

Jennifer S. Lowden
Assistant 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: SR 710 Surplus Property Sales, Proposed Rulemaking

April 10, 2015

Dear Ms. Lowden:

On behalf of Sequoyah School, the following comments are prepared in response to **Caltrans Notice of Proposed Rulemaking, February 26, 2015**. Caltrans has invited interested persons to present statements or arguments with respect to alternatives to the proposed regulatory action.

Current Uses –Social and Economic Impacts: The proposed excess 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 government code; the process for notifications appraisals, offers etc.

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.

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.

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