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Wednesday, August 5, 2015
sent by email and U.S. Mail

SCH Number 1982092310
File: 07-LA-710 (SR 710)
Project: EFIS 0700000191 (EA: 187900)
Title: State Route 710 North Study

Garrett Damrath
Chief Environmental Planner
Caltrans District 7
Division of Environmental Planning
100 S. Main Street, MS – 16A
Los Angeles, California 90012

Sent by email to:

Re: Objections and Comments to Draft EIS/EIR for State Route 710 North

Dear Mr. Damarath:

This letter is sent on behalf of myself as an individual and on behalf of the Caltrans Tenants of the 710 Corridor, an unincorporated association. We hereby request that all of these comments be incorporated into the Administrative Record and receive full responses, as contemplated by CEQA and NEPA.

**Failure to Coordinate Light Rail Alternative
With Gold Line Eastside Extension EIR/EIS**

The pending EIS/EIR for the Gold Line Eastside Extension project show proposed station locations along the existing and future portions of that light rail line. The SR 710 North EIS/EIR fails to acknowledge and offer alternative light rail proposals that connect to the eastern extension of the Gold Line in Montebello, especially at Garfield Avenue. The SR 710 Light Rail alternative can avoid the displacement of residents and businesses along Atlantic Boulevard by moving the north-south to an elevated or tunnel line along Garfield Avenue from I-10 Freeway to the future Garfield Avenue Station in Montebello. See attached diagram from Gold Line Eastside Extension EIS/EIR, page ES-9, figure ES-5. An added benefit of a Garfield Avenue route could allow the train to continue south along Garfield on the possible aerial route of the Gold Line Extension southward on Garfield. In order for the SR 710 Light Rail Alternation to reach Garfield along the I-10 Freeway it would need to travel east along the

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I-10 Freeway. An elevated route over the I-10 Freeway could commence at Cal State LA and run eastward over the I-10 Freeway. The failure of the SR 710 LRT alternative to coordinate with the Gold Line is a failure to analyze a valid feasible alternative LRT route that will serve more people and result in less displacement.

**Choosing a Light Rail Alternative With
Fundamental Defects That Renders It a Fraudulent Alternative**

The SR 710 LRT alternative fails to follow the route of the possible SR 710 freeway tunnels. This is an area with Caltrans has already acquired many properties and can retain subsurface rights if the properties are sold. The SR 710 LRT alternative could follow the proposed tunnel route north from Cal State LA. As smaller LRT tunnels (20 feet diameter vs. 60 foot freeway tunnel diameter), the LRT could be built under Meridian Avenue in South Pasadena and have one station under the existing Mission/Meridian Gold Line Station (Foothill Line). Then the new LRT tunnel follow under the Gold Line right-of-way to the Fillmore Station in Pasadena. This LRT tunnel route reduces additional acquisitions and displacements and better coordinates with the Gold Line Foothill Line.

**Reliance on Financing Method That Violates Federal Securities Law
By Misleading Potential Investors in Tunnel Tolls and Vehicle Trips**

The SR 710 North EIS/EIR proposes to rely on private "Public Private Partnership" ("P3") funding for the single or dual bore SR 710 tunnels. This financing method is not available under federal securities laws. The proposed P3 financing methods relies on dishonest and false calculations of toll revenue and vehicle usage of the future tunnel or tunnels. The cost of the tunnel or tunnels has been dishonestly and willfully underestimated in the Cost Benefit Analysis. This, any attempt to obtain P3 financing would of necessity involve misstatements of material fact as to cost and income and the ability to repay investors. This violates the Municipal Offering Rules of the U.S. Securities and Exchange Commission. Reliance on this illegal and knowingly false funding method renders P3 financing unavailable for evaluation of the environmental impacts. Without funding the tunnel or tunnels and the various mitigation measures cannot be properly constructed without diverting limited funds from other needed local and regional transportation projects.

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**The \$700 Million in Measure R Funds Can Be Better Spent
on More Environmentally Beneficial Transportation Projects**

There is approximately \$700 million remaining to be spent on the SR 710 Corridor under Measure R passed by the L.A. County Voters in 2008. Many transportation needs in the Regional Transportation Plan remain unfunded or under-funded, including the Gold Line Foothill Extension Phase 2B from Azusa to Claremont, and many others. Cancelling the SR 710 North as a freeway tunnel or tunnels will allow the MTA Board in 2019 to re-program the \$700 million to more environmentally beneficial projects.

**Improper Segmenting of EIS/EIS from Other Related
Environmental Studies and Concurrent Caltrans and MTA Projects**

This SR 710 North EIS/EIR is improperly segregated in its analysis from numerous other related and overlapping projects. This include the SR 710 South EIS/EIR, the Gold Line Eastside Extension EIS/EIR, and the several environmental documents related to the sale of surplus Caltrans properties within the SR 710 North corridor. Such properties were specifically acquired beginning in the 1960's for the SR 710 Freeway Project. Over 100 are of national historic significance and eligible for inclusion on the National Register of Historic Places. A number have been left vacant intentionally by Caltrans practices of not performing regular maintenance and setting rental rates so high that no one will rent them. Many of the historic properties have deteriorated with Caltrans active or passive neglect. These include the properties at 1200 and 1199 South Pasadena Avenue in Pasadena. 1199 South Pasadena Avenue is the McWilliams property where the internationally known chef Julia Child (maiden name Julia McWilliams) grew up in Pasadena from 1912 to 1930. The Queen Anne style home at 1200 Pasadena Avenue is crumbling from Caltrans neglect. None of the various environmental documents propose any mitigation measure for the restoration and preservation of these and the approximate 100 other historic properties in the SR 710 Corridor owned by Caltrans, and which Caltrans plans to sell with a restoration or preservation plan.

Sincerely,



Christopher Sutton

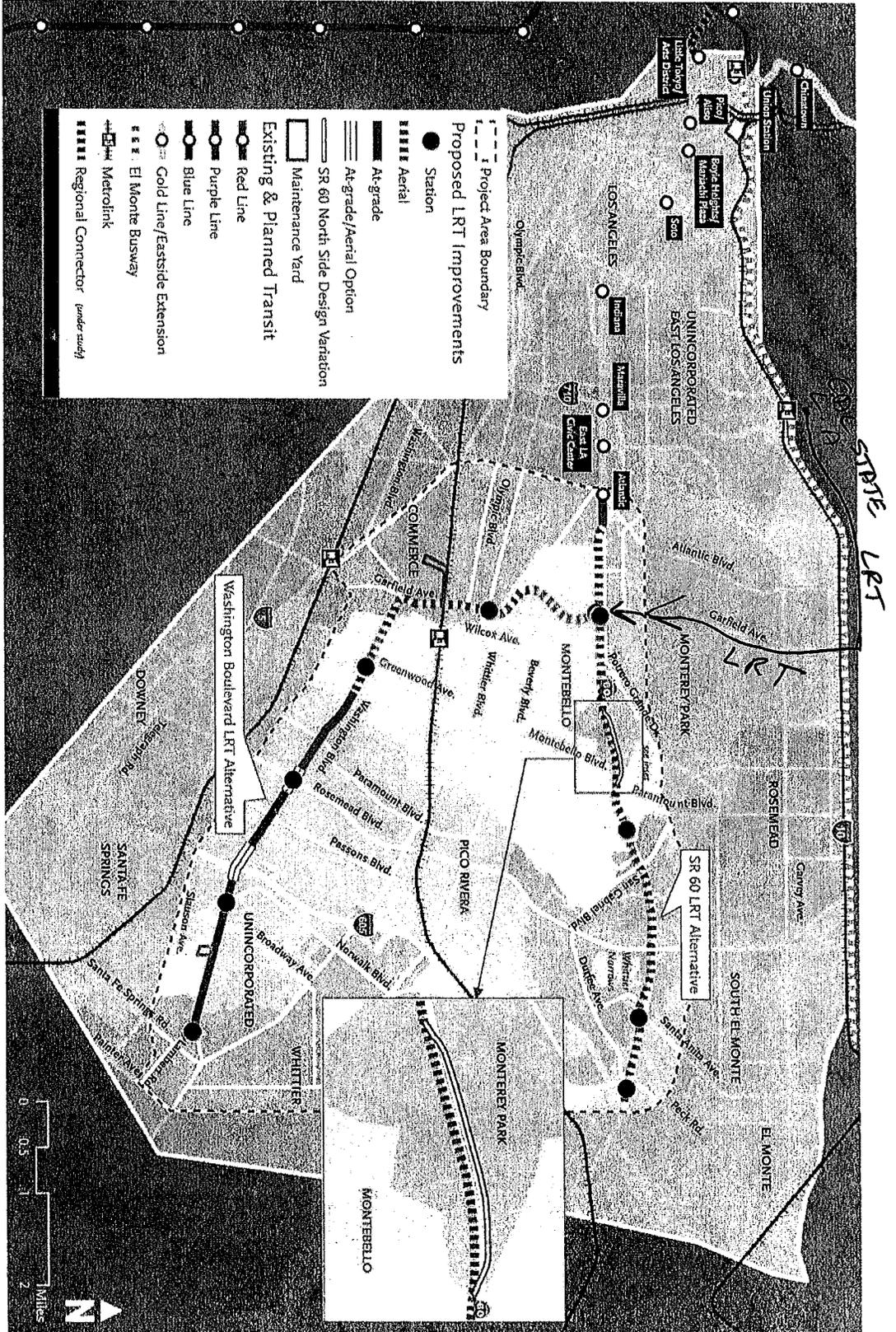


Figure ES-5: Build LRT Alternatives Studied in the EIS/EIR

Draft Environmental Impact Statement/Environmental Impact Report
 Draft for Internal Discussion Only



ATTACHMENT 1
 TO SUTTON LETTER