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**Submitted electronically**

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**RE: Interstate 110 Transit Way Connector Project, I-110 HOV/HOT Flyover Connector**

Dear Ms. Toledo:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Section 106 process and its Finding of Adverse Effect (FOE) for the Interstate 110 (I-110) Flyover Project. As we have previously stated in correspondence and in public meetings with Caltrans and the community, the Conservancy is concerned about this project and undertaking, and again question its overall purpose and need. While we concur with the FOE document in regard to this project's clear direct and indirect impacts on historic resources, we do believe the scope is too narrow and must be broadened to fully assess the range of impacts associated with constructing a substantial flyover connector structure.

The FOE document states "the proposed project will be compatible with the existing visual character of the project corridor," and Alternative 2 "is as compatible as possible with existing historic properties."<sup>1</sup> While we appreciate efforts to minimize the visual impact and harm of this flyover connector structure through design modifications, no amount of intervention or "dressing up" the flyover can effectively "lighten" or make this structure compatible with the existing community and historic context. Therefore we strongly disagree with the FOE document stating that the proposed structure is "compact, light and minimal."

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<sup>1</sup> FOE, I-110 Flyover Project, Page 3



Rather this is a structure that will have profound visual impacts and serve as a physical barrier, disrupting important viewsheds and breaking up parts of this neighborhood.

The FOE document identifies both direct and indirect impacts. In regards to St. John's Cathedral, a National Register-listed and designated local landmark (HCM #516), the FOE inaccurately states “the project would be compatible with the existing visual character of the corridor.”<sup>2</sup> If built, the flyover will be immediately adjacent to the Cathedral and clearly visible and will obscure the view, setting and future overall experience of the historic landmark. The FOE ultimately concurs, stating it “has the potential to visually impair the view.” Figures 17 and 18 show St. John’s Cathedral from the southeast yet appear to intentionally crop out the full viewshed whereas the flyover is essentially out of view, apparently to attempt to minimize the impact. These images should be modified and accurately depicted to show the full extent of the undertaking and impact on the broader community viewshed and St. John’s Cathedral.

We question analysis that states there will be no operational noise impacts on St. John’s Cathedral. We think it stands to reason that there will be an increase in auditory impacts given the scale of the flyover, its proximity, and experiences with similar transportation structures employed elsewhere. Additional analysis should be undertaken and provided in detail to the consulting parties and the public.

Further, we disagree with the FOE document statements that the proposed project would have no effect on St. John’s Cathedral’s integrity of feeling or association, or that the adverse effect finding is isolated to only one structure. While there have been neighborhood changes over time and previous undertakings, a large flyover structure nearby will be the most egregious and dramatic change to occur, resulting in cumulative and irreversible adverse effects. In this regard we think there are additional and similar impacts on other historic resources nearby (not just to St. John’s Cathedral), and should be reevaluated to accurately identify the full range of direct impacts. One example is St. John’s Parish House which the FOE document states will not have an adverse effect of setting. It dismisses impacts on this resource only because it was moved and reoriented shortly after it was built in 1922-23. The Conservancy disagrees, as the building’s setting will be adversely affected, regardless of it being reoriented nearly a century ago. The experience of this historic building and others will dramatically change if the proposed flyover structure is built and damages the overall setting and character of this community.

It’s important that a range of alternatives are considered and documented in the FOE, including: 1) moving the undertaking to another site, 2) using an alternative project design, 3) designing a new undertaking, and 4) canceling the undertaking. Eleven alternatives are offered in brief within the FOE document, however do not provide substantive details. We request that more analysis be provided on these, in addition to providing detailed information that substantiates the purpose and need for this undertaking. We remain concerned as there does not appear to be clear and compelling documentation that

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<sup>2</sup> FOE, I-110 Flyover Project, Page 35



outlines the cost-benefit analysis of the proposed flyover structure versus other alternatives that may achieve similar results, while minimizing and avoiding the adverse effects (both direct and indirect).

Overall the Conservancy urges Caltrans to further assess impacts as part of a revised or supplemental FOE document. We look forward to continuing to work with Caltrans and the community stakeholders as further consultation is offered, with the hope that we all can come together on a project that ensures impacts are fully addressed. In addition to the Section 106 process we would like to see a timeline for how this project and undertaking will be coordinated through the California Environmental Quality Act (CEQA) and Section 4(f).

Thank you and I look forward to participating as the review and consultation process moves ahead on this project.

Sincerely,



Adrian Scott Fine  
Director of Advocacy

Cc: Advisory Council on Historic Preservation  
Mayor Eric Garcetti  
Assemblymember Reggie Jones-Sawyer  
Councilmember Current Price, CD9  
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