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Sent Electronically

Susan Tse Koo
California Department of Transportation
100 South Main Street
Los Angeles, CA 90012
Email: susan.tse@dot.ca.gov, 11oadamsproject@metro.net

**RE: Notice of Preparation (NOP) for the I-110/Adams
Terminus Improvement Project Environmental Impact
Report**

Dear Susan Tse Koo:

On Behalf of the Los Angeles Conservancy I am writing to comment on the Notice of Preparation (NOP) for the I-110/Adams Terminus Improvement Project Environmental Impact Report (EIR). In 2016, the Conservancy opposed the Interstate 110 High-Occupancy Toll Lanes Flyover Project proposed by Caltrans. That project, much like this current project, proposed a flyover alternative extending from the I-110 freeway to Figueroa Street. Today we remain steadfast in our opposition to a flyover as its construction represents an outdated mode of transportation planning and will have significant unavoidable impacts to the area's historic resources, namely St. John's Cathedral, St. Vincent de Paul Church, the Automobile Club of Southern California, the Thomas Stimson House, and the University Park Historic Preservation Overlay Zone (HPOZ).

Though the reasoning behind this project remains limited, Metro and Caltrans have stated that the departments are looking to create a faster connection on the I-110 by studying alternatives to reduce congestion on the I-110/Adams Boulevard off-ramps and associated intersections. Without any additional substantiating information or traffic statistics released to the public, we seriously question the purpose and need for such a large-scale construction project.

To date, the proposed project is shrouded in ambiguities with few plan details and no Initial Study released to the public. At the November 6 and 9 public scoping meetings, few if any details were given for Project Alternatives 2 & 3 which will involve significant construction and potential



impacts to the environment. Alternative 2 proposes the construction of an above grade flyover extending from the end of the ExpressLanes to the Figueroa Street/Figueroa Way intersection. No other information has been provided at this time. Alternative 3: Arterial Alternative will use the existing ExpressLanes off-ramp and moves traffic along surface streets until connecting to Interstate 10 at 18th and Olive Streets. It is unclear what the full scope of this alternative is beyond a general mapping of the route.

Without the release on an Initial Study for the proposed project, it is unclear whether or not the project is necessary. Caltrans stated increased congestion and heightened accidents at this location. However, the agency has not provided any statistics for these claims. In fact, several community residents during the November 9 scoping meeting commented that this project is a solution in search of a problem. We question whether these claims justify the proposed project.

The Conservancy continues to be invested in working with Caltrans and Metro to identify and pursue all feasible and prudent alternatives that can avoid and minimize harm to historic resources and produce an outcome beneficial to the community. We welcome any and all opportunities to meet with project team representatives to gain a better understanding of the project's needs and goals and participate in a meaningful dialogue.

A key policy under the California Environmental Quality Act (CEQA) is the lead agency's duty to "take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history."¹ To this end, CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."² The fact that an environmentally superior alternative may be more costly or fails to meet all project objectives does not necessarily render it infeasible under CEQA.³ Reasonable alternatives must be considered "even if they substantially impede the project or are more costly."⁴ Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁵

Conclusion

The Conservancy continues to question the purpose and need for the proposed project. As stated in 2016, the proposed project is a dated approach to transportation planning that has been demonstrated time and again to fail. The perceived benefits by Caltrans and Metro do not outweigh the significant adverse impacts. Such a project creates both a physical barrier and scar on the community. The Conservancy strongly urges the project team to reconsider and remove

¹Public Resource Code, Sec. 21001 (b), (c).

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

³ Guideline § 15126.6(a).

⁴ *San Bernardino Valley Audubon Soc'y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁵ Public Resources Code § 21081.5.



any flyover alternative from the proposed project. We welcome any opportunity to meet with the project team to discuss alternatives that are more in line with the needs of the community.

About the Los Angeles Conservancy:

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 5,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Senior Director of Advocacy

cc: West Adams Heritage Association
Office of Historic Resources, City of Los Angeles

