

SR-710 North Project
07-LA-710 (SR-710)
EA: 187900
EFIS ID: 0700000191

STATEMENT OF OVERRIDING CONSIDERATIONS
CALIFORNIA DEPARTMENT OF TRANSPORTATION
FOR THE STATE ROUTE 710 NORTH PROJECT
IMPROVEMENTS ON STATE ROUTE 710 AND/OR THE SURROUNDING AREA
FROM NORTH TO INTERSTATE 210, SOUTH TO INTERSTATE 10,
EAST TO INTERSTATE 605 AND WEST TO INTERSTATE 5 AND STATE ROUTE 2

The following information is presented to comply with State CEQA Guidelines (Title 14 California Code of Regulations, Division 6, Chapter 3, Section 15093), and the Department of Transportation and California Transportation Commission Environmental Regulations (Title 21 California Code of Regulations, Division 2, Chapter 11, Section 1501 et seq.). Reference is made to the Final Environmental Impact Report (Final EIR) for the project, which is the basic source for the information.

The following impacts were identified as significant and not fully mitigatable in the Final EIR as resulting from the Preferred Alternative, the Transportation Systems Management/Transportation Demand Management Alternative (TSM/TDM Alternative):

Cultural Resources

The 2014 Historic Property Survey Report (HPSR) and the 2017 Supplemental HPSR identified 84 properties in the Area of Potential Effects (APE) that were determined to be historical resources for the purposes of CEQA. The list of 84 properties includes those listed on the National Register of Historic Places and eligible historic properties, those listed on the California Register of Historical Resources or eligible resources per State Historical Resources Commission determination resources, resources identified as significant in surveys that meet Office of Historic Preservation standards, or resources that are designated landmarks under local ordinances.

In accordance with CEQA, Caltrans analyzed the potential impacts of the TSM/TDM Alternative on the 84 historical resources located within the APE. It was determined that the construction and operation of the TSM/TDM Alternative would cause a significant impact to the Arroyo Seco Parkway Historic District as follows:

The Fair Oaks Avenue off-ramp with its vegetated embankment is a character-defining feature of the Arroyo Seco Parkway. Widening the northbound SR-110 (Arroyo Seco

Parkway) off-ramp at Fair Oaks Avenue from two lanes to four lanes on the outside will remove portions of the ramp itself, including character defining curbs and the character-defining vegetated embankment. Therefore, the widening of the off-ramp would cause a significant impact on the Arroyo Seco Parkway Historic District.

A 275-foot retaining wall, ranging from approximately 6 to 20 feet in height, will be installed along the south side of the widened Fair Oaks Avenue off-ramp to accommodate the new configuration. The retaining wall is needed to support Grevelia Street at the top of the wall and allow the proposed lane configuration of the northbound off-ramp. The wall would be approximately 22 feet tall near the base of the ramp and would gradually diminish in height to ground level at approximately 50 feet from the top of the ramp. At the top of the ramp, a concrete barrier and a three-foot planting area would separate the roadway from the new sidewalk along the south side of Grevelia Street to the top of the ramp. A 275-foot K-rail deflective concrete barrier would be installed at the base and front of the proposed retaining wall for safety. The installation of the retaining wall and concrete barrier would remove portions of the ramp and its character-defining features causing a significant impact on the Arroyo Seco Parkway Historic District.

A new southbound SR-110 State Street on-ramp, approximately 2500 feet long, would be constructed approximately 2,300 feet east of Fair Oaks Avenue and immediately adjacent to the existing State Street off-ramp. The existing SR-110 off-ramp on State Street that accesses Fair Oaks Avenue would be shifted to the north and realigned. The off-ramp at State Street, the chain-link fence, and landscaped shoulder are character defining features of the Arroyo Seco Parkway. The reconfiguration of the off-ramp and construction of a new on-ramp would remove portions of the historic property. Therefore, reconfiguration of the State Street off-ramp to construct a new on-ramp would cause a significant impact on the Arroyo Seco Parkway Historic District.

The proposed on- and off-ramp reconfiguration is located within the Arroyo Seco Parkway Historic District and introduces new design features into the historic district, including new stone landscaping, new curbs, and new barriers. Although the proposed new features would be similar to the historic off-ramp features, the construction of a new on-ramp would require removal of landscaping features that characterize the property and introduce new cobblestone paving, thereby changing the setting of the historic district in that area. Therefore, the proposed on- and off-ramp reconfiguration would cause a significant impact on the Arroyo Seco Parkway Historic District.

To support the reconfiguration of the State Street off-Ramp from SR-110, a new retaining wall and concrete barrier will be constructed. The wall and barrier, approximately 2000 feet in length, will be constructed along the edge of the SR-110 shoulder to support the grade differential between the ramp and State Street. The retaining wall would be 22 feet at its maximum height and 8 feet at its minimum. The recommended wall type is consistent with the existing stone face or "crazy quilt" rock pattern wall on the southbound side of SR-110 toward downtown and adjacent to the

Figueroa Tunnel sections. The treatment proposed for the unplantable gore and shoulder area is a cobblestone rock blanket.

The SR-110 off-ramp at State Street is a character-defining feature of the Arroyo Seco Parkway, and the installation of the retaining wall and concrete barrier will remove portions of the ramp and its character-defining features. Therefore, the proposed retaining wall would cause a significant impact on the Arroyo Seco Parkway Historic District. The proposed retaining wall and barrier are located within the Arroyo Seco Parkway Historic District and introduce new elements that are incongruous within the historic district. Therefore, the proposed retaining wall and barrier would cause a significant impact on the Arroyo Seco Parkway Historic District.

The State Street off-ramp will be reconfigured to accommodate the new southbound on-ramp. Construction would require moving the existing off-ramp approximately 65 feet north from its existing location. This realignment would require acquisition of approximately 9,750 square feet from the southeastern portion of APN 5317-090-092 to accommodate the reconfigured southbound off-ramp. In addition, a new retaining wall and concrete barrier, approximately 290 feet long and 8 to 12 feet high would be installed along the edge of shoulder.

The SR-110 off-ramp at State Street is a character-defining feature of the Arroyo Seco Parkway, and the reconfiguration of the ramp and installation of a retaining wall and concrete barrier would alter the ramp and its character-defining features. Therefore, the proposed ramp reconfiguration and retaining wall would cause a significant impact on the Arroyo Seco Parkway Historic District.

The proposed ramp reconfiguration, retaining wall, and barrier are located within the Arroyo Seco Parkway Historic District and would introduce new elements that are incongruous within the character of the historic district. Therefore, the proposed ramp reconfiguration, addition of a retaining wall, and new barrier would cause a significant impact on the Arroyo Seco Parkway Historic District.

The Phase 1 Roadway dual-tone paved surfaces (design, not materials) of the Arroyo Seco Parkway Historic District are character-defining features and restriping in those areas has the potential to cause a significant impact on the Arroyo Seco Parkway Historic District.

Impacts would remain significant after implementation of the following mitigation measures (Measures CUL-1 (Pre-Construction Surveys, CUL-2 [Arroyo Seco Parkway Historic District] and CUL-12 [Property-Specific Protection Plans] and CUL-13 [Post-Construction Building Surveys]). Mitigation measures for the Arroyo Seco Parkway Historic District as applicable to the Preferred Alternative, are contained in the approved Memorandum of Agreement (MOA) between the State Historic Preservation Officer (SHPO) and Caltrans and are described below and in Section 3.7.4 of the Final EIR.

- **CUL-1 Pre-Construction Surveys**

Pre-construction surveys are required and shall be conducted on all historic properties with a Finding of Adverse Effect (FOAE) or Finding of Conditional No Adverse Effect before any construction activities commence. The pre-construction survey will be performed by a licensed structural engineer with a specialization in historic buildings in collaboration with a qualified architectural historian and/or historic architect. The qualifications for the structural engineer, architectural historian, and/or historic architect shall be approved by a Caltrans professionally qualified staff (PQS) in collaboration with the Los Angeles County Metropolitan Transportation Authority (Metro).

- **CUL-2 Arroyo Seco Parkway Historic District – Secretary of Interior Standards (SOIS) Plan**

The plan will conform with the SOIS and will be prepared in consultation with the Caltrans Cultural Studies Office (CSO) and the SHPO, as required. The TSM/TDM Alternative would destroy landscaped buffers, install new retaining walls within the boundaries of this historic district, move an existing off-ramp at State Street, add a new on-ramp, and widen another off-ramp. These significant impacts of the TSM/TDM Alternative improvements in the historic district cannot be avoided.

To minimize the effects on the character-defining features of the Arroyo Seco Parkway Historic District, the new construction for the TSM/TDM Alternative improvements shall be designed in a manner that is consistent with the SOIS. The project architectural historian shall review the final design plans, review mockups as needed, and conduct a field visit to ensure that the following work is performed in accordance with the SOIS. At a minimum, the SOIS plan will ensure that:

- New elements such as retaining walls, off-ramps, on-ramps, lighting, and curbing will be designed to be compatible with the historic district in terms of color, materials, profiles, dimensions, and so forth.
- Any work taking place on character-defining features will minimize potential damage to the historic district.
- All revegetation of buffers and planting strips will be designed to be compatible with the historic district.

Caltrans will install a highway sign near the northern entrance to the Arroyo Seco Parkway at Glenarm Street that welcomes drivers to the Arroyo Seco Parkway Historic District. The sign will be compatible with similar signage found at the southern entrance to the Parkway.

- **CUL-12 Property-Specific Protection Plans.**

The intent of the property-specific protection plan is to ensure that the potential effects of the preferred alternative on each property with significant impacts are addressed by specific measures implemented as part of the project pre-construction, construction, and post-construction phases.

At a minimum, the property-specific protection plan for the properties adversely affected by the selected alternative will include the following for each affected property:

- Name, address, boundary, and description of the historic property.
- List of potential adverse effects of the selected alternative on each historic property and the measures included in that alternative to address those effects.
- Key actions required in each measure.
- Party/parties responsible for implementing each key action in each measure.
- Other party/parties involved in implementing, overseeing, and/or documenting
- the implementation of the key actions in each measure.
- Timing of the implementation of the key actions in each measure (final design/pre-construction, construction, and/or post-construction).
- Requirements for documenting compliance with the requirements of each measure.
- Other relevant technical and supporting information.

During final design, the project engineer, in consultation with the historic architect, the architectural historian, the structural engineer, the acoustical engineer, and the geotechnical engineer, will prepare a property-specific protection plan for all properties adversely affected by the project. Properties subject to this measure are the historic properties that would be adversely affected by the Build Alternatives.

The property-specific protection plans shall be prepared in consultation with the Caltrans CSO and the SHPO, as required.

A property-specific protection plan will be prepared during the final design for each of the historic properties adversely affected by the preferred alternative.

The project engineer, resident engineer, and the construction contractor will be required to implement the property-specific protection plans for each property during the appropriate project phases (pre-construction, construction, and/or postconstruction).

- **CUL-13 Post-Construction Building Surveys.**

Post-construction building surveys (which have the same level of effort, qualifications for preparers, scope, and implementation as the pre-construction surveys described in Section 3.7.4.2 of the Final EIR/EIS) will be conducted for the properties where the project will result in significant impacts.

The post-construction surveys will be completed within two months or 60 days following completion of the work in a specific area. The construction contractor and the resident engineer will notify the structural engineer and architectural historian when construction in the vicinity of a specified historic property or properties is completed. At that time, the structural engineer, the historic architect, the architectural historian, the geotechnical engineer, and other appropriate qualified specialists will conduct the post-construction surveys. The results of the survey will be documented in a written report, illustrated with photographs and drawings, as appropriate.

Traffic

Significant impacts to intersections and freeway segments will occur based on the following metrics:

- If an intersection is projected to operate at level of service (LOS) E and the increase in delay over the No Build Alternative is 5 seconds or more; or
- If an intersection is projected to operate at LOS F and the increase in delay over the No Build Alternative is 2 seconds or more.
- If a freeway segment is projected to operate at LOS F and the increase in traffic demand compared to the No Build Alternative is 2 percent or more.

These measures have also been used to identify impacts under CEQA.

The traffic analysis includes operational analysis for 156 intersections and 606 freeway segments in an extended study area. Detailed analyses were conducted for existing conditions (2012) and future conditions (i.e., 2020, 2025, and 2035 for the TSM/TDM Alternative). The operations of the freeway segments and intersections for the horizon year (2035) Build Alternatives were compared to the existing conditions (2012).

For existing conditions, 14 of the 156 intersections operate at LOS E in one or both peak periods, and 5 of the 156 intersections operate at LOS F. Improvements were considered to address the significant impacts at the identified intersections and freeway segments. However, mitigation measures are not proposed at all the intersections and freeway segments with significant impacts, for reasons detailed in the Final EIR Tables 3.5.15 and 3.5.16 for the TSM/TDM Alternative (see attached).

As a result, the TSM/TDM Alternative would result in significant impacts on study area intersections and freeway segments that cannot be mitigated to below a level of significance.

Overriding considerations that support approval of this recommended project are as follows

Overriding considerations are based on the engineering and environmental technical analysis, the project's impact on the environment, and the comments and concerns expressed during the public review period. The Final EIR was prepared to address all public comments and incorporate any refinements made to the project design, environmental setting and impacts that have been identified since the Draft EIR and Focused Recirculated Draft EIR (Focused RDEIR) were completed.

The Freeway Tunnel Alternative with Single Bore Tunnel design variation was determined to provide operational benefits, after:

- comparing and weighing the benefits and impacts of the study alternatives summarized in Table ES-1 of the Final EIR;
- reviewing the comments received during the public circulation of the Draft EIR and Focused RDEIR;
- and completing technical studies and performance evaluations for each of the alternatives.

However, with the lack of funding and the lack of community consensus, the Single Bore Tunnel Alternative, estimated at \$3.15 billion, cannot be accomplished successfully within a reasonable period of time to achieve all aspects of the project purpose and need.

The TSM/TDM Alternative would attain the purpose and need of the project, as discussed in Section 1.2 of the Final EIR. This Alternative would improve local traffic operations, mobility and accessibility and enhance modal choice, while accommodating planned growth within the study area and minimizing environmental impacts. The TSM/TDM Alternative would provide direct benefits for traffic circulation on local arterials and some benefit to the regional freeway and transit networks resulting from the following improvements:

- Signal optimization
- Local street and intersection improvements
- Transit service improvements
- Bus service enhancements
- Bicycle facility improvements

The TSM/TDM Alternative consists of relatively small capital cost investments with low impacts that include operational improvements and strategies that increase the efficiency and capacity of the existing transportation system, while reducing the effects of localized bottlenecks and chokepoints.

The TSM component of this alternative includes Intelligent Transportation Systems (ITS), local street and intersection improvements and Active Traffic Management (ATM) throughout the study area.

The TDM component of the alternative includes expanded bus service, bus service improvements and bicycle facility improvements throughout the study area. The TSM/TDM Alternative also encourages automobile, public and private transit, ridesharing programs, and bicycle and pedestrian improvements as elements of a unified urban transportation system.

The TSM/TDM Alternative has the fewest number of freeway segments that would be adversely affected and is tied with the BRT Alternative for the lowest number of total intersections and freeway segments adversely affected¹.

The following additional factors support the identification of the Preferred Alternative. (They are not in order of importance and do not represent all of the benefits or impacts associated with the Preferred Alternative).

Community Impact Factors

- The Preferred Alternative is generally consistent with the Pasadena, Rosemead, San Gabriel, San Marino, and South Pasadena General Plans and most of the local jurisdictions' Specific Plans as discussed in Section 3.1.2 of the Final EIR.
- The Preferred Alternative would have the lowest overall adverse effects related to property acquisitions and it would not displace any residents or residential land uses.
- The Preferred Alternative would have the least number of historic resource impacts when compared to all of the other build alternatives.

Local Traffic Circulation Factors

- The Preferred Alternative includes signal optimization on corridors with signal coordination hardware already installed as a part of LA County's Traffic Signal Synchronization Program (TSSP). The corridors include Del Mar Avenue, Rosemead Boulevard, Temple City Boulevard, Santa Anita Avenue, Fair Oaks Avenue, Fremont Avenue, and Peck Road.
- The Intelligent Transportation Systems (ITS) improvements (traffic signal upgrades and synchronization, transit signal prioritization, changeable message signs and detection systems) provide incremental benefits that are independent of any capital transportation improvements.
- The Preferred Alternative includes local street and intersection improvements within the cities of Los Angeles, Pasadena, South Pasadena, Alhambra, San Gabriel, Rosemead, and San Marino.

¹ Depending on the design and operational variation, the Tunnel Alternative could have 2 fewer total intersections and freeway segments adversely impacted or could have up to 16 more total intersections and freeway segments adversely impacted.

- Intersection improvements will reduce delay at individual intersections regardless of other local or regional transportation projects.
- The Preferred Alternative includes transit service improvements by improving bus headways to between 10 and 30 minutes during the peak periods and between 15 and 60 minutes during the off-peak periods. Some of the bus service enhancements will result in almost twice as many buses as the existing service.
- The expanded bus service can be implemented incrementally to provide increased transit service for existing and future users.
- The Preferred Alternative includes bicycle facility improvements that consist of on-street Class III bicycle facilities that support access to transit facilities throughout the study area. It will also provide expanded bicycle parking facilities at existing Metro Gold Line stations. The expanded bicycle network will enhance access to both local destinations and the regional transit system.

Natural Resource Factors

The Preferred Alternative does not result in any impacts to State jurisdictional wetlands or Federal or Regional jurisdictional drainages.

Economic and Fiscal Factors

- The construction cost estimate for the Preferred Alternative is approximately \$105 million and can be funded utilizing existing resources, unlike the single bore freeway tunnel that is estimated to cost approximately \$3.15 billion and subject to local fund restrictions. (Use of Measure M funds to construct a SR 710 tunnel is prohibited).
- Available funding for the Preferred Alternative includes local Measure R funds.
- A process is underway for community consensus to be achieved for the expenditure of \$105 million from Measure R funds for the preferred alternative.

For the above reasons, the Preferred Alternative has also been identified as the Environmentally Superior Alternative (pursuant to CEQA).

District Director:
(or designee)

John Bulinski
Print name


Signature

1/25/19
Date