

### **3.6 VISUAL QUALITY**

#### **1. The description of the local visual environmental settings is inadequate for assessing visual quality impacts.**

There is little information on the visual characteristics and context of the areas in which the alternatives will be located, such as spatial attributes of major public streets, open spaces, cityscape and building modulations, mountain views, important “gateways” into the City, landscaping, long and short sightlines and viewsheds. An accurate and sufficient environmental setting description is required by both NEPA and CEQA:

*NEPA 40 CFR 1502.15: “The Environmental Impact Statement shall succinctly describe the environment of the area(s) to be affected or created by the alternatives under discussion.”*

*CEQA §15125: “(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant... (c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project...”*

The setting description is especially important for the City of Pasadena, which has mountain views, rich historic resources and architecture, a vibrant shopping district and active global tourism.

#### **2. The Draft EIR/EIS fails to provide a summary map of the Tunnel Alternative north portal physical characteristics.**

The Draft EIR/EIS is deficient as an informational document, because it fails to provide a north portal summary map that shows the tunnel alignment, major street and bridge removals, redirections or additions, new structures and their specific location, sound walls and other significant physical alterations. While most of the required information can be found in document text and figures, this information is scattered throughout the 26,625-page document. Failure to provide a summary map lays a large burden on the public to sort through the document, surmise what the collective physical changes look, like and then assess the visual environmental impacts. This is especially true given the size of the tunnel project and its different tunnel variations.

Project summary maps are required by CEQA.

*CEQA §5147. TECHNICAL DETAIL. “The information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant*

*information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public.”*

Note: After the Draft EIR/EIS was released to the public, WPRA members spent more than a week trying to discern the proposed north tunnel portal physical layout for both the single-bore and dual-bore variations. Much of the information had to be derived from the text; other information was later found in maps and figures buried in the technical reports and appendices. While a high-level (albeit still deficient) map was presented by Metro at an SR-710 Technical Advisory Committee (TAC) and Stakeholder Outreach Advisory Committee (SOAC) meeting, and at a public hearing, Metro staff initially refused to provide copies to the public when requested. The map of the north portal area was finally released approximately 2 months into the Draft EIR/EIS public comment period. See Figure C.

### **3. The Visual Impact Analysis fails to adequately consider Pasadena’s rare and unique visual attributes, and underestimates the Tunnel Alternative’s environmental impacts.**

According to CEQA, an EIR should place special emphasis on rare and unique environmental resources that would be affected by the project.

*CEQA §15125: “(a) An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published .... (c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project...”*

The City of Pasadena is a ‘site of cultural significance’ with many rare and unique environmental resources. These are fully documented in a Finding of Inadequacy documented in Sec. 3.7, Cultural Resources, of this report. With respect to visual quality, this includes but is not limited to scenic vistas of the San Gabriel Mountains, TV and camera views for newscasters and viewers of the annual New Year’s Tournament of Roses Parade, historic architecture in Old Pasadena and nearby neighborhoods, and views visible to tourists while dining, shopping, etc.

As stated in Pasadena’s General Plan Open Space and Conservation Element:

“Since the City’s founding in 1874 as the Indiana Colony, individuals from around the United States have come to Pasadena to settle or to vacation, drawn particularly by the area’s abundant natural resources and scenic beauty, most notably provided by the backdrop of the San Gabriel Mountains.” (See City of Pasadena General Plan, Open Space and Conservation Element, p 55.)

Little is said about Pasadena’s rare and unique visible setting in the Visual Impact Analysis. Mountain vistas do appear to have been considered in the ‘Vividness’ criteria for visual quality, but other unique visual assets are ignored. For example, there is no discussion of visual impacts to the Tournament of Roses parade route. In addition, there is no mention of historic architecture in the VIA architectural design considerations (see Section X). The proposed enormous, dayglo-colored, extremist style ventilation towers are in shocking contrast to Pasadena’s old town,

which is listed in the National Register of Historic Places and is the 1995 Great Main Street America national awardee. This proposed ventilation facility concept demonstrates Metro's total lack of regard and insensitivity for the city's history and character. See Figure A. Although one of the other ventilation facility locations might be selected and a better architectural design could be developed, the ventilation structure(s) will still be large and massive, and will dominate the visual landscape. Placing these appalling structures in Pasadena's historic neighborhoods and business district is inappropriate at best. Moreover, the tunnel alternative includes the construction of an electric substation in Old Pasadena. This would also be contrary to the area's historic characteristic and degrade its context.

A search of the word 'historic' in the VIA primarily results in statements imbedded in a laundry list of local general plans and policies, for which the Draft EIR/EIS does not comply. Discussions and possible commitments to respect historic architectural design and aesthetics have been overlooked or deferred until 'subsequent phases of this project' (VIA, p. 235).

**Figure A: Metro rendering of Ventilation Towers on Colorado Blvd. in Historic Old Pasadena**



Visual Simulation: Proposed View at W. Colorado Blvd.

**4. The selection criteria for Key Views is inadequately described, and the Key Views selection process was unsuccessful in identifying important impacted views in Pasadena.**

As stated in the VIA, Section IV, p. 37 "Key views form the foundation for the Visual Impact Analysis. All visual impacts are relative to these Key Views."

It goes on to describe the process by which Key Views were selected. First, mapping data were used to deliver a preliminary set of views. Next, a field study was performed to either confirm

views or to eliminate them because of physical obstruction. Apparently new views were not added as a result of the field study. Finally, the list was narrowed down to 'thirty' sites. This round number appears to reflect a predetermined limit, rather than a thoughtful assessment of the number of views required to properly assess visual quality environmental impacts. Selection criteria appear to have been fuzzy. For example, it is stated that views were confirmed to be representative of the study area and that "a Key View may be selected based on the land use, population density, and view duration of the study area from that point" (emphasis added).

This selection process was NOT successful in establishing the Key Views required to assess environmental impacts for the Tunnel Alternative in Pasadena. An example of a Key View that is NOT representative of the tunnel site area is shown in Figure B. This view is almost 2000 feet south of the tunnel exit and the view from this site is obscured by already existing buildings. Consequently, it is not indicative of views of the tunnel portal and should have been eliminated in the field study.

Examples of important Key Views of the north portal that were not assessed include views where the large ventilation tower(s) block mountain views, views of torn down and rebuilt bridges, and views of the proposed electric substation. These views would demonstrate significant visual quality changes. A meaningful visual environmental impact assessment cannot be made if the Key Views are not properly selected

**Figure B: View in Pasadena on California Blvd. Looking North  
(from Draft EIR/EIS, Volume 2, Key View 26-FWY, p. M-59)**



Existing Condition



Visual Simulation: Proposed Freeway tunnel impact at W. California Boulevard and Saint John Avenue.

**5. The mapping for Key Views is confusing and didn't adhere to mapping conventions.**

Project alignment and direction is crucial, particularly the general north-south orientation of the proposed project. North should be at the top of the map and south at the bottom. West should be left and east should be at the right side. To have maps that use both conventions is disorienting and confusing. This is especially true for those living in the San Gabriel Valley, where the mountains provide a strong orientation 'north.'

To add to the confusion, the table describing existing conditions, Key View 30 – FWY, uses the wrong directions, describing the Norton Simon Museum as being on the west side of West Colorado Boulevard. The Museum is actually on the north side of West Colorado Boulevard (see VIA, page 201). Businesses are on both sides of West Colorado – the north side and the south side. West Colorado itself runs along an east-west axis. This must be corrected and the rest of the document edited appropriately.

All of the maps, overheads based on maps, and photo simulations should contain the location, at a street level. The first paragraph of each narrative description of the Key View should, at a minimum, include the city or unincorporated area in which it is located. Local streets near the Key View should be labeled.

There is no such city as the “City of East Los Angeles.” In general, this area is unincorporated Los Angeles County, also known as East L.A. This should be revised throughout the VIA.

**6. A VIA of the north tunnel portal cannot be made because the design and location of the electric substation and ventilation towers have been improperly deferred.**

The design and location of two very large facilities at the Tunnel Alternative north portal site have been improperly deferred – the electric substation and the ventilation tower(s). The addition of these two facilities in Old Pasadena will represent a very large visual environmental impact that will affect business owners, residents and visitors alike. Insufficient and conflicting information on these facilities is provided throughout the Draft EIR/EIS.

In the description of the tunnel alternative (Draft EIR/EIS, Volume 1, p. 2-71), it is stated

“An electrical substation is proposed to deliver temporary power to the tunnel boring machine during construction and permanent power for tunnel operations after construction is complete. The location of the substation would be coordinated with the Los Angeles and Pasadena Departments of Water and Power.”

There is no discussion of the electrical substation in the VIA. Furthermore, the size, appearance and location of the substation is not provided elsewhere in the Draft EIR/EIS.

Descriptions of the tunnel ventilation towers are contradictory throughout the report. For example, in Volume 1, Chapter 2, p. 2-70, it says

“At the north portal, two locations for the ventilation structures are being considered. The first option would be an approximately 50 ft high ventilation structure located at the SR 710/SR 134 interchange. The second option would be four 50 ft high ventilation structures located at the SR 710/Colorado Boulevard interchange.”

An image for the first ventilation facility was not provided, except as an octagon on a map from a birds-eye view. The image provided for the second location is shown in Figure B above. It shows six ventilation structures rather than the four described above.

At a Metro-sponsored community meeting, held on March 11, 2015, a map was displayed showing yet another location for the ventilation facility near the Green Street bridge. No further information was available on the number of towers, size or exact location of the facility. See Figure C.

Without a baseline concept for the electrical and ventilation facilities, a meaningful Visual Impact Analysis of the north tunnel portal cannot be performed and environmental impacts and mitigations cannot be assessed. This is in violation of CEQA:

**2014 CEQA Statutes and Guidelines, §15126.4 CONSIDERATION AND DISCUSSION OF MITIGATION MEASURES PROPOSED TO MINIMIZE SIGNIFICANT EFFECTS:** (a)(1) *An EIR shall describe feasible measures which could minimize significant adverse impacts ....(B) Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way.*

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**City of Long Beach v. Los Angeles Unified Sch. Dist. (2009) 176 Cal. App. 4th 889 (2009), 916.** *“Impermissible deferral of mitigation measures occurs when an EIR puts off analysis or orders a report without either setting standards or demonstrating how the impact can be mitigated in the manner described in the EIR.”*

**2014 CEQA Statutes and Guidelines, §5151. STANDARDS FOR ADEQUACY OF AN EIR :** *An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences.*

**Figure C: Snapshot of the ventilation tower options presented at the SR-710 Public hearing on March 11, 2015.** The map shows a third ventilation tower(s) option located near the Green Street bridge.



**7. The DRAFT EIR/EIS improperly minimizes the visual impacts of the proposed Tunnel Alternative sound walls.**

Section 3.6 assumes that the sound wall proposed at the southeast corner of West Colorado Boulevard and Pasadena Avenue would “be a moderate impact to viewers outside the restaurant, and a high visual impact to those inside the restaurant” (Draft EIR/EIS, Section 3.6, page 3.6-25). The wall, which would be built if the dual-bore variation becomes the preferred alternative, would wrap itself around the building, from Pasadena Avenue to several feet along West Colorado Boulevard within the existing private property line. It would have a height ranging between 6 feet and 14 feet, and would extend 84 feet in length. At 14 feet, the wall would be the average height of a one-story building. Yet this is considered to be a “moderate” impact, with the mitigation being that the wall would require treatment in conformance with the *Caltrans Highway Design Manual* (see page 3.6-28 of the Draft EIR/EIS):

. . . The final designs of sound walls and retaining walls adjacent to identified viewer groups or within sensitive Key Views within State-owned right of way and for the Freeway Tunnel Alternatives will be based on Caltrans Highway Design Manual standards and consideration of community input. Metro design standards will be used for the Transportation System Management/Transportation Demand Management, Bus Rapid Transit, and LRT Alternatives. The wall designs will include enhancements such as, but not limited to graphic patterns and colors based on input gathered from the local community, stakeholders, and Caltrans. [Italics added.]

No visual simulation is provided for this wall, which appears to be within the boundaries of the Old Pasadena National Register District. This should have been provided.

Additionally, two more sound walls are proposed along the northeast quadrant of the interchange of SR 134 and SR 210 near the foot of Orange Grove Place and Cypress Avenue. A portion of these walls would extend to 20 feet in height, nearly the height of a two-story building, thereby dwarfing the single-family homes it is supposed to insulate from noise and visual insult. It is not specifically stated that this would consist of a single wall along Orange Grove Place and a portion of Caltrans right-of-way. This wall or combination of walls would extend for 1,207 feet (Draft EIR/EIS, Volume 1, p. 3.6-25). Simulations, with a minimum of the wall relationships to the existing dwellings, should have been provided.

At a minimum, a design feature such as noise walls in an historic district and in a residential area should be part of the visual quality analysis. This information should be released immediately as part of a re-circulated Draft EIR/EIS.

**8. The Draft EIR/EIS trivializes the visual impacts during tunnel construction and improperly defers mitigations.**

The VIS, Section IX, Project Visual Impact Summary, states:

“It is anticipated that the construction activities would include numerous heavy construction including the expected use of Tunnel Boring Machines (TBM), staging

areas, materials storage areas, the construction sites themselves and material movement corridors. Many, if not all of these activities take place at or below grade making these activities create lesser visual impacts from the surrounding areas at the same view plane.”

This description minimizes the scale of the tunnel construction activity at the portals. For example, in addition to the one or two 60-foot diameter TBMs, other equipment is likely to include a slurry filtering/recycling plant, trains to move muck, a dewatering plant, a tunnel lining segment plant, and very large crawling cranes – 7 or 8 stories high. This will all occur adjacent to historic neighborhoods, the Old Pasadena National Register District, schools and local businesses. Furthermore, while the TBM will be underground, much of the tunnel construction work is still performed above ground at the portals (see the list above). The tunnel alternative also includes the construction of an Operations and Maintenance facility, a ventilation facility and an electrical substation. Moreover two large bridges will be torn down and one rebuilt. To trivialize this 5+ year, massive construction operation is a dishonest portrayal of the environmental impacts near the construction site and for a great distance beyond.

Mitigations for visual impacts during construction have been inappropriately deferred until ‘subsequent phases of the project development’ (see VIS, p. 224 and Volume 1, Table ES-1, p. 32). Moreover, the suggested mitigations offered are borderline absurd and insulting. For example, vegetative screening is offered, including the planting of trees. We assert without risk, that no matter how fast a tree grows in 5 years, it is unlikely to screen a 7 to 8-story crane or the massive construction operations that that will take place at the construction site.

**9. The VIA fails to address either short or long-term visual impacts associated with the reasonable possibility of having to fix a failed Tunnel Boring Machine (TBM) from above ground.**

The real possibility of a TBM breakdown and typical TBM recovery scenarios are covered in Findings of Inadequacy in Section 3.23-Construction, of this document. The Draft EIR/EIS failed to assess the visual impacts to communities along the tunnel route if a TBM recovery operation were required from above ground. As evidenced by the Seattle Alaskan Viaduct tunnel breakdown, recovery scenarios could require very large construction sites and operations lasting years. Entire blocks of residential neighborhoods and/or businesses might be seized by eminent domain, cleared, and replaced with a construction site that includes 7 or 8-story high cranes. A TBM repair operation – similar to that performed for Seattle’s Bertha TBM – is shown in Figures D and E. This reasonable scenario was not addressed in the VIA.

**Figure A: A TBM Recovery Scenario: Looking South Along S. Pasadena Ave Towards Huntington Hospital (a similar rescue operation could occur anywhere along the tunnel route in Pasadena, South Pasadena or El Sereno).**



**Figure B: A TBM Recovery Scenario: Looking Northeast Towards Mission Street in South Pasadena (a similar rescue operation could occur anywhere along the tunnel route in Pasadena, South Pasadena or El Sereno).**



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WEST PASADENA RESIDENTS' ASSOCIATION  
RESPONSE TO SR-710 NORTH STUDY DRAFT EIR/EIS, 8/3/2015

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