

**Appendix C.3**  
**Groups and Organizations (GO)**  
**GO1 - GO16**

**From:** Phyllis Ling <pling.hcnnc@gmail.com>

**Sent:** 12/12/2022 6:49:22 PM

**To:** LAART@metro.net

**Subject:** Toll Free Number for the LA ART DEIR Public Hearing via Zoom on 12/13/2022

Hello,

A resident who only has a landline asked me to find out if he can call into the LA ART DEIR public hearing tomorrow using one of Zoom's toll free numbers. The phone number provided is the San Jose phone number, which would cost him over 20 cents per minute for the call.

Will the toll free phone numbers work for joining the Zoom meeting?

Thanks,

Phyllis Ling

Historic Cultural North Neighborhood Council

Outreach Committee Chair • Solano Canyon Resident Representative

Email: [pling.hcnnc@gmail.com](mailto:pling.hcnnc@gmail.com)

Website: [hcnnc.org](http://hcnnc.org)

Subscribe: [hcnnc.org/subscribe](http://hcnnc.org/subscribe)

GO1-1



December 12, 2022

Mr. Cory Zelmer  
Deputy Executive Officer, Metro  
One Gateway Plaza, Mail Stop 99-22-6  
Los Angeles, CA 90012

**RE: Los Angeles Aerial Rapid Transit Project (LA ART)**

Dear Mr. Zelmer,

CCA represents over 300 businesses, non-profits and trade organizations with a shared commitment to Downtown’s vibrancy and increasing opportunity in the region. We are writing in support of the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART) that would connect Union Station to Dodger Stadium. The concept offers significant potential benefits to the City of Los Angeles and the broader communities of Los Angeles County by removing cars off the road, increasing access to public transit and improving air quality. It is also a key example of next generation transportation systems that will be critically important for LA’s clean air future, which will require revolutionizing transportation on a scale not seen since the introduction of automobiles. LA ART has the potential to substantially improve traffic safety and facilitate mobility, while reducing traffic congestion and fuel consumption.

GO2-1

The emissions reductions from this permanent transit link, with its game-day capacity of 10,000 to 12,000 Dodger Stadium visitors, could benefit local communities by replacing up to 3,000 existing car trips before and after each Dodger game and Stadium event. In addition, the project’s year-round operation opportunities can increase transit access for underserved communities and increase access to parks.

GO2-2

Projects like these are important in addressing climate change and as an opportunity to create local jobs and economic opportunities for our communities, which is critically important as we look to move into the pandemic recovery phase and toward the future, including planning for the 2028 Olympics in Los Angeles.

We are pleased to support the LA ART project, recognizing the significant benefits potential from a successful project, and hope the approvals can be completed to realize the LA ART project’s benefits in time for the 2028 Olympics.

GO2-3

Sincerely,

Jessica Lall  
President & CEO

**From:** <darrel@acsgroup-usa.com>  
**Sent:** 12/14/2022 12:55:23 AM  
**To:** <LAART@metro.net>  
**Subject:** Public comments

To whom it may concern, My name is Darrel Saucedo Chairman of the Los Angeles Latino Chamber of commerce.

I would like to go on the record, that the LALCC is recommending, that this project hire at least 35% local small diverse business, to not only construction but to provide maintenance and staff thru

Local American Job centers of California (AJCC)

Darrel A. Saucedo  
Chief Operating Officer

8531 Wellsford Pl., Suite E  
Santa Fe Springs, CA. 90670  
562-464-0880 Office : 562-464-0884 fax  
562-556-6492 cell

Contracting with Integrity, Commitment & Loyalty

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GO3-1

# Los Angeles Union Station Historical Society

▶ RECEIVED ◀

NOV 29 2022

**P.O. 411682**  
**Los Angeles CA 90041**  
**(626) 799-3925**  
**laushs@earthlink.net**

11/22/22

Mr. Cory Zelmer  
Deputy Executive Officer  
LA Metro  
One Gateway Plaza, Mail Stop 99-22-6  
Los Angeles, CA 90012

Ref: Comments Opposing LA ART "Gondola" Draft EIR

Dear Mr. Zelmer,

The Board of Directors (The Board) of the Los Angeles Union Station Historical Society (LAUSHS), a non-profit, Section 106 designated historic preservation consultant for Los Angeles Union Station (Union Station), a world recognized National Historic Landmark owned by Los Angeles County Metropolitan Transit Authority (LA Metro), has voted to formally comment against Los Angeles Aerial Rapid Transit's (LA ART) private, for-profit "gondola" (cable car system) and public land and air rights development scheme that proposes to link Union Station and LA Metro's supporting "Esplanade" project with Dodger Stadium that The Board believes is an unfair and illegal (pending a Superior Court decision) "accommodation" for LA ART. The Board believes that LA ART's proposed "futuristic-style" Union Station Terminal on Alameda Street and LA Metro's supporting "Esplanade" project will blight the historic and architecturally significant west facade of Union Station, and that Union Station, its passenger trains and patrons could be physically harmed if aircraft from the nearby Los Angeles Police Department's "Hooper Memorial Heliport" airport become entangled in LA ART's overhead cables and towers. Furthermore, The Board opposes LA Metro's planned removal of all "Disabled Parking" spaces from the "Esplanade" area, without public hearings or reasonable alternatives, to accommodate a new so-called "water feature" (aka a fogging-type water fountain) which is intended to cool LA ART riders cued-up for their rides to Dodger Stadium. Moreover, the water feature would be contrary to the state's water conservation policy. (Even if the water feature recirculates, at least 10% of its water will be lost to evaporation day after day, year after year.)

GO4-1

Until now, The Board has steadfastly refused to take sides in the above major, multi-million-dollar development scheme. However, in The Board's opinion LA Metro and its staff have obviously taken a pro-active role supporting LA ART, a potential competitor of LA Metro's efficient "Dodger Express" motor coach service, as well as planning to "gild the lily" of Union Station with its "Esplanade" project, all "backstage," using public land and airspace without public discussion and participation as required by LA Metro policy and law.

cont'd  
GO4-1

Among the reasons for The Board's opposition are, but not limited to:

A) LA Metro Board member Mayor Eric Garcetti, who introduced the motion to assist LA ART without public discussion or participation and to enlist LA Metro staff to "carry LA ART's water," i.e., facilitate it, did receive, according to public records, millions of dollars in both "behest payments" and political cash contributions from real estate and LA ART "gondola" developer Frank McCourt and/or his various entities and associates, which in The Board's opinion, is an apparent conflict of interest. Consequently, LA Metro is being sued by the non-profit California Endowment for willfully preventing public discussion and participation in the decision to partner with LA ART.

GO4-2

B) In The Board's opinion, LA Metro Deputy Executive Officer Cory Zelmer falsified an official document--LA ART's Draft Environmental Impact Report--by ticking-off the DEIR box that states there is no airport within two miles (or 3520 yards) of LA ART's proposed LA ART Union Station Terminal, when he had been informed repeatedly to the contrary by The Board. The Board presented proof to Zelmer and his superior, LA Metro CEO Stephanie Wiggins, that the Los Angeles Police Department's "Hooper Memorial Heliport"--variously described as the country's or the world's busiest airport for rotary-winged aircraft (aka helicopters) --is only 880 yards from LA ART's proposed Union Station Terminal. Furthermore, The Board reminded Zelmer and Wiggins that according to the Los Angeles Police Department, the California Department of Transportation, the California Public Utilities Commission, the Federal Aviation Administration, and the 8th U.S. Circuit Court of Appeals, all heliports are airports, i.e., a location where any type of flying machine is serviced. The fact that some airports serve only rotary-wing aircraft while others serve both rotary-wing aircraft and fixed-wing aircraft (airplanes) does not change the fact that all "heliports" are "airports" in the eyes of the governing agencies and the Federal Courts.

GO4-3

Furthermore, the argument that Hooper Memorial is a police airport, not a civilian airport, and therefore not an airport as far LA ART's DEIR is concerned, is fallacious and spurious. Any aircraft that becomes entangled in LA ART's cables and 13-story towers and thus crashes into Union Station, its trains and patrons would cause catastrophic harm regardless had that aircraft launched from a police airport or a public airport. Simply put, LA ART's proposed location is *not safe* for Union Station and Hooper Memorial Heliport airport.

*"General Notice A. Safety is of the first importance in the discharge of duty."  
-Los Angeles Union Passenger Terminal Rules and Regulations*

C) Contrary to the promises made to The Board by Stephanie Wiggins, Cory Zelmer and LA ART, no meeting has ever been organized between them and The Board to discuss the difference of opinions concerning the nature of LAPD's Hooper Memorial Heliport airport and the proposed location for LA ART's Union Station Terminal.

GO4-4

D) LA Metro has forbidden The Board's examination of the only known 3-D scale model of Union Station's location because, in The Board's opinion, of a deliberate subterfuge that the model dating from former Union Station owner--the Santa Fe Railway--is too old to be accurate today, and furthermore the sharing of the model with The Board would somehow be a "conflict of interest" even though The Board previously had access to the model in years past. However, The Board's use of the model does not depend on the model's age, but only the juxtaposition of Union Station with Alameda Street which has not changed appreciably since the station was opened in 1939. Consequently, at a loss for options, The Board asked LA ART to produce a 3-D scale model given its apparent resources, but LA ART has never responded. This "shadow play," in The Board's opinion, is being performed by LA Metro and LA ART to obfuscate the issues and delay public criticism of LA ART and contrary to the public weal which LA Metro is obliged to serve. Furthermore, since the model is public property, The Board's use should be permitted so it can be compared to LA ART's distorted, wide-angle, artist's renderings of its proposed Union Station Terminal with Union Station's Hispanic-Art Deco architectural style. Simply put, it is The Board's opinion that cable car rides belong in San Francisco and Disneyland, not in front of Los Angeles' world famous "Cathedral of Transportation."

GO4-5

E) In The Board's opinion, LA ART is designed to, among other things, compete with LA Metro's "Dodger Express," a highly efficient service that could be improved if LA Metro switched to modern, environmentally friendly motor coaches that it might fund by the savings from not building its Esplanade project.

GO4-6

F) Given the seasonal nature of baseball, it is also The Board's opinion that LA ART is a "Trojan Horse" proposal to facilitate year-around for-profit real estate development in Dodger Stadium's vicinity using public land and resources.

GO4-7

G) LA Metro's proposed Esplanade project, according to LA Metro employees--who wish to remain anonymous for the sake of their careers--will be funded by so-called "overlap money" that was "peeled-off" from LA Metro's defunct LINK-US project that itself was rejected because of The Board's and the public's opposition. Moreover, LA Metro has stated to The Board's Executive Director via telephone that it plans to accomplish the Esplanade project by eliminating all public parking including all "disabled parking" from the front of Union Station without public discussion or participation in violation of the Americans with Disabilities Act (ADA). Furthermore, according to a retired LA Metro staff person, the Esplanade's so-called "water feature" (a fogging-type water fountain) will likely attract "homeless" citizens seeking showers, contrary to LA Metro's stated policy--according to former LA Metro Union Station supervisor the late Ken Pratt--of not catering to the needs of the "homeless." In The Board's opinion, The Esplanade's is designed to cool future LA ART and "Olvera Street" customers as they walk between Union Station, LA ART's terminal and the "Hispanic-style" Olvera Street tourist attraction.

GO4-8

(While Olvera Street's right-of-way and some of its structures and art works are historic, the "Olvera Street Tourist Attraction" per se was developed in the 1930s by a husband-and-wife real estate development team who went on to develop Los Angeles' "New Chinatown Tourist Attraction." Alas, historic Chinatown was demolished in a racist bid to rid Los Angeles of the Chinese who settled there after building the railroad to Los Angeles. Union Station was then built on top of old Chinatown's rubble.)

cont'd  
GO4-8

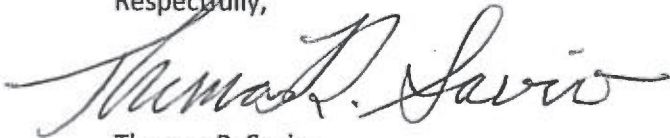
Moreover, erecting the Esplanade water feature, whilst semi-desert Los Angeles is experiencing one of its worst droughts in history, flies in the face of the State of California's policy to lessen environmental harm. One only needs to recall the classic Los Angeles-based movie "Chinatown" to understand what The Board believes is driving the related LA ART and Esplanade schemes. To paraphrase the immortal Yogi Berra: "It's 'Chinatown' (*the movie*) all over again."

GO4-9

For the above reasons, but not necessarily only because of them, the Board of Directors of the Los Angeles Union Station Historical Society opposes construction of LA ART and LA Metro's related Esplanade project in the interests of honest government, Union Station preservation, the environment and above all **safety**.

GO4-10

Respectfully,



Thomas R. Savio  
Executive Director  
Los Angeles Union Station Historical Society

Cc. Stephanie Wiggins, CEO, LA Metro  
Karen Bass, Mayor-Elect of Los Angeles



**From:** Wilson Gee <wilson.gee@firecracker10k.org>  
**Sent:** 12/6/2022 10:06:32 PM  
**To:** LAART@metro.net  
**Subject:** Gondola Project

On behalf of Firecracker10k Committee, I would like to submit our letter of support for the Gondola project that will be built in our Chinatown community.

Best, Wilson Gee, Board Member



Aug 12, 2022

Stephanie Wiggin, CEO Metro  
One Gateway Plaza  
Los Angeles CA, 90012

Ara Najarian  
Metro Board Chair  
500 West Temple  
Los Angeles, CA 90012

RE: Los Angeles Aerial Rapid Transit Project (LA ART)

Dear Ms. Wiggins and Honorable Metro Board Chair, Ara Najarian:

On behalf of the Firecracker Board of Directors, I am writing to express our support for the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Chinatown to Dodger Stadium. LA ART offers significant potential benefits to the City of Los Angeles and specifically the community of Chinatown by increasing access to public transit, improving air quality by removing cars off the road, and highlighting the businesses and culture in the area.

GO5-1

This project will improve mobility and increase access to opportunity for the local community. The LA ART represents a zero-emission permanent transit link that would provide game-day capacity of 10,000 to 12,000, replacing up to 3,000 trips before and after each Dodger game and Stadium event. It would also provide year-round operation opportunities to increase transit access for underserved communities and parks.

GO5-2

In addition, by connecting Union Station to Chinatown, LA ART would create a cultural landmark that will enhance the visibility of Chinatown and increase visitors to the business corridor. The project represents an opportunity for businesses along Broadway and across Chinatown to create partnerships with LA ART to highlight and learn more about the attractions, culture, history, and events in Chinatown.

GO5-3

I appreciate LA ART's diligence in working with Metro and the community to bring to life a vision for a safe, accessible transit option for the community and urge you to support this important investment for Chinatown.

Sincerely,

Raymond Su  
President, Board of Directors  
Los Angeles Chinatown Firecracker Run Committee, Inc.

GO5-4



List of Signatures in support for the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART)

#	Name	Title	City
1	Michelle Jong	Past President, Chinese Family History Group	Long Beach
2	clayton frech	CEO and Founder, Angel City Sports	Los Angeles
3	David Kent Gold	President, Bicycle Angels	Redondo Beach
4	Evelyn Lee	President, Chinese Family History Group	Long Beach
5	Jose J. Hernandez	Principal, Ann Street Elementary	Los Angeles
6	Lisa Loo	Director - Community Services	San Gabriel
7	Jorge Parra Jr.	Educator	Los Angeles

GO5-5



**From:** Dennis Huang <dennis@abala.org>  
**Sent:** 12/7/2022 5:00:33 PM  
**To:** LAART@metro.net  
**Subject:** Comment on the DEIR

Please accept this as my comment on the Draft Environmental Impact Report for the LA Aerial Rapid Transit.

Dear Mr. Cory Zelmer:

As an office tenant of Chinatown for over 5 years, we like to see our community develop and advance. Having the Aerial Rapid Transit will bring more foot traffic which will help with economic development. Chinatown is very tourist friendly and walkable. We also like to see increased security and funding from this new transit to support Chinatown shops.

On behalf of our board of directors and 1200+ members, we are in full support of the LA Aerial Rapid Transit.

Dennis J. Huang  
\*Executive Director & CEO\*  
\*A\*sian \*B\*usiness \*A\*ssoiation  
767 N. Hill Street, Suite 308  
Los Angeles, CA 90012  
(213) 628-1ABA  
dennis@abala.org  
www.abala.org

<<https://abala.org/yearend/>>Year End Contribution  
<<https://abala.org/yearend/>>

\*Upcoming Events\*

Dec 6 CalSavers and Covered CA for small businesses

<<https://abala.org/#!event/2022/12/6/what-you-need-to-know-about-calsavers-and-covered-ca-programs-1>>

Dec 7 Members's Year End Celebration

<<https://abala.org/membership/upcoming-events/#!event/2022/12/7/members-apos-year-end-celebration>>

Jan 19 Stop Light Member Mixer

<<https://abala.org/membership/upcoming-events/#!event/2023/1/19/stop-light-mixer>>

GO6-1

**From:** Kellie Hawkins <hawkins.kellie@gmail.com>  
**Sent:** 12/18/2022 1:28:27 AM  
**To:** LAART@metro.net  
**Subject:** I support zero-emissions transportation in Los Angeles

Dear Mr. Cory Zelmer,

I support the proposed zero-emission Los Angeles Aerial Rapid Transit Project (LA ART), connecting Union Station to Dodger Stadium.

The gondola would benefit visitors to Dodger Stadium and the community by taking cars off the road, increasing access to public transit, and reducing greenhouse gas pollution. Projects like these are important in addressing climate change and improving the quality of life for Angelenos.

Sincerely,  
Kellie Hawkins Davis  
Climate Resolve Boardmember

GO7-1

**From:** "john@johngiven.com" <john@johngiven.com>  
**Sent:** 12/21/2022 12:29:38 AM  
**To:** LAART@metro.net  
**Subject:** LAART DEIR Comment (SCH 2020100007) - Objection to Metro as Lead Agency

Dear Mr. Zelmer -

Attached please find a comment letter on behalf of LA Parks Alliance with respect to the above-captioned LA Aerial Rapid Transit project Draft EIR. Please ensure that the comment is included in the public record for the project.

The attached letter is focused on Metro's improper decision to act as Lead Agency for the project pursuant to Public Resources Code section 21067 and CEQA Guidelines section 15051. LA Parks Alliance will follow up with an additional comment letter with respect to the Draft EIR before the comment deadline in January.

I would appreciate your confirmation of receipt, and I thank you in advance for this courtesy.

Sincerely,

John Given

--

John Given  
Law Office of John P. Given  
2309 Santa Monica Boulevard, #438  
Santa Monica, CA 90404  
(310)471-8485

--

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December 19, 2022

**Via email ONLY to LAART@metro.net**

Corey Zelmer  
Deputy Executive Officer  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Mail Stop 99-22-6  
Los Angeles, CA 90012

RE: Los Angeles Aerial Rapid Transit Project  
SCH 2020100007  
**Objection to Metro as Lead Agency**

Dear Mr. Zelmer:

This letter is submitted on behalf of LA Parks Alliance<sup>1</sup> with respect to the above-captioned Los Angeles Aerial Rapid Transit Project (the “Project”) in response to the release of the Project’s Draft Environmental Impact Report (“Draft EIR” or “DEIR”). This letter focuses on LA Parks Alliance’s strong objection to Los Angeles County Metropolitan Transportation Authority (“Metro”) acting as lead agency for the Project’s environmental review instead of the proper lead agency, the City of Los Angeles. LA Parks Alliance will submit a more thorough comment letter regarding the Project’s inadequate environmental review before the current comment deadline in January 2023.

GO8-1

**The City of Los Angeles Must be the Lead Agency for the Project, not Metro**

Metro asserts it is the appropriate lead agency — “the public agency with the greatest responsibility for supervising or approving the project as a whole.”<sup>2</sup> Metro fails to offer an explanation as to how or why it should (or even can) be considered the public agency with the greatest responsibility for supervising or approving the project. Review of the relevant statutes shows Metro cannot be the lead agency because it has insufficient authority to authorize or supervise the Project. The City of Los Angeles must be the lead agency for the Project.

GO8-2

FN GO8-1

<sup>1</sup> LA Parks Alliance was formed in 2019 as a response to land use threats to LA State Historic Park. Its members are park and public space advocates. See <https://www.laparksalliance.org>.

FN GO8-2

<sup>2</sup> DEIR, p. ES-1, quoting but not specifically citing Cal. Code Regs. Tit. 14 (hereinafter CEQA Guidelines), § 15051(b).

### **A. CEQA Requires the City of Los Angeles to be the Lead Agency for the Project**

Public Resources Code section 21067 defines “lead agency” as “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.” (See also CEQA Guidelines, § 15367.)

CEQA Guidelines section 15051 explains the *mandatory* process by which a lead agency is chosen:

Where two or more public agencies will be involved with a project, the determination of which agency will be the lead agency shall be governed by the following criteria:

(a) If the project will be carried out by a public agency, that agency shall be the lead agency even if the project would be located within the jurisdiction of another public agency.

(b) If the project is to be carried out by a nongovernmental person or entity, the lead agency shall be the public agency with the greatest responsibility for supervising or approving the project as a whole.

(1) The lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose such as an air pollution control district or a district which will provide a public service or public utility to the project.

(2) Where a city prezones an area, the city will be the appropriate lead agency for any subsequent annexation of the area and should prepare the appropriate environmental document at the time of the pre zoning. The local agency formation commission shall act as a responsible agency.

(c) Where more than one public agency equally meet the criteria in subdivision (b), the agency which will act first on the project in question will normally be the lead agency.

(d) Where the provisions of subdivisions (a), (b), and (c) leave two or more public agencies with a substantial claim to be the lead agency, the public agencies may by agreement designate an agency as the lead agency. An agreement may also provide for cooperative efforts by two or more agencies by contract, joint exercise of powers, or similar devices.

Here, there are numerous public agencies that will be involved with the project. As the DEIR acknowledges, permits and other approvals will be required from the California Department of Transportation (CalTrans), California State Parks, Cal/OSHA, the City of Los



Angeles, and Metro. (DEIR, pp. 2-57, 2-61 to 62.) Guidelines section 15051 therefore applies.

There is no doubt the Project will not be “carried out” by Metro. Metro tacitly admits as much by quoting CEQA Guidelines section 15051 subdivision (b) in the DEIR, which would not apply if Metro planned to carry out the project. Subdivision (a) would instead apply and Metro would be the appropriate lead agency. (DEIR, p. ES-1.) But as all available evidence shows, Metro will *not* carry out the Project.

Metro documents, created during a confidential process by which Metro determined ARTT LLC would have sole source status to construct and operate the Project, show that the Project “is envisioned to be privately designed, built, operated, maintained, funded, insured, and financed” and that “Metro does not envision taking a hands-on, prescriptive, or performance minded approach to this project, instead focusing on the elements of the project for which Metro would be responsible.” (Response to Metro Request for Information [“Response to Metro”], Sept. 26, 2018, p. 8.)<sup>3</sup> Thus, CEQA Guidelines section 15051 subdivision (a) does not apply.

Guidelines section 15051 subdivision (b), which does apply, *strongly* disfavors Metro as the lead agency because Metro does not have the “greatest responsibility for supervising or approving the project as a whole.” First, in admitting that it will not take a hands-on, prescriptive approach to the Project, Metro has disavowed that it will supervise the Project’s construction.<sup>4</sup> Second, Metro’s role in approving the Project will be limited. It will focus only on the Project elements for which it is responsible. (*Ibid.*)

According to the DEIR, Metro’s oversight is limited to three approvals:

- review and approval of Project plans for design, construction, and implementation;
- an easement or other approval to allow construction and operation of the Project within a portion of Los Angeles Union Station; and,
- an encroachment permit or other approval to allow construction and operation of the Project within Metro’s Gold Line right-of-way.

(DEIR, p. 2-61.)

The first of the above approvals that will purportedly be made by Metro is properly within the jurisdiction of Cal/OSHA’s Amusement Ride & Tramway Division, not Metro. It appears the primary reason the Project proponent agreed that Metro could *also* review and

cont'd  
GO8-3

GO8-4

GO8-5

<sup>3</sup> See also, Response to Metro, p. 16:

“Unlike other Metro projects, the ART is a privately funded/financed, designed, built, operated, maintained, and insured transport conveyance to a private property that is open to the public. Like Dodger Stadium, the ART system will be open to the public for certain events and activities but not publicly owned. It is more akin to the Palm Springs Aerial Tram as a service provided for transportation to a specific location.”

<sup>4</sup> Nor does Metro have the authority to supervise the Project. See section D, *infra*, pp. 8-10.

FN GO8-4

FN GO8-5

approve its plans is because the proponent specifically requested and negotiated with Metro to serve as the lead agency, not because it believes Metro has primary authority over the design, construction, and implementation of the Project. To the contrary, as LA ART argues and LA Parks Alliance agrees, Metro clearly does not have this authority:

In response to Metro’s assertion that ART is subject to Metro approval under the requirements of the California Public Utilities Code (“CPUC”), ARTT LLC agrees in general that such approval is appropriate since ARTT LLC has asked Metro to act as the Lead Agency for environmental clearance, together with assistance with the acquisition of surface land and/or aerial easements, as necessary, and the potential location of a passenger station at or near Los Angeles Union Station. We do ask Metro to recognize, however, that **aerial gondolas and tramways are regulated by the California Labor Code, Sections 7340-7357, and the detailed implementation of design, plans, and specifications falls under the jurisdiction of the Department of Industrial Relations, Division of Occupational Safety and Health (“Cal/OSHA”), which includes an Amusement Ride and Tramway Unit.** (Response to Metro, p. 16 [emphasis added].)

cont'd  
GO8-5

The DEIR acknowledges that approvals from Cal/OSHA’s Amusement Ride & Tramway Division will be required pursuant to Cal. Code Regs. Tit. 8, §§ 3150-3191, including a Certificate of Construction. (DEIR, p. 2-61.) It does not, however, mention that California law requires all passenger tramways to receive a permit pursuant to Division 5 of the California Labor Code. The DEIR is therefore incomplete and inaccurate for failing to acknowledge this additional requirement.<sup>5</sup>

GO8-6

CEQA’s mandatory process to determine the appropriate lead agency does not permit confidential negotiations between a project proponent and its preferred public agency for the role, a perverse sort of lead agency “forum shopping.” (See *Planning & Conservation League v. Department of Water Resources* (2000) 83 Cal.App.4th 892, 906 [“PCL v. DWR”]: private party and local agency are “not at liberty to anoint” the local agency as lead agency through a private agreement.)

GO8-7

Moreover, compared to Metro’s somewhat limited role with only two necessary approvals (both for use or encroachment upon Metro land), the anticipated role of the City of Los Angeles is far more extensive and complex. The DEIR identifies the necessary City approvals as likely including, but not limited to:

GO8-8

- a franchise agreement to operate “upon, over, under, or along any street, highway or other place in the City of Los Angeles”;

FN GO8-6

<sup>5</sup> California Labor Code, § 7341: “A passenger tramway shall not be operated in any place in this state unless a permit for the operation of the tramway is issued by the division, and unless the permit remains in effect and is kept posted conspicuously in the main operating terminal of the tramway.”

- approval of the Project design from the Cultural Affairs Commission for components located within the City’s public right-of-way;
- creation of a Specific Plan;
- adoption of a Sign District;
- a Plan Approval under the existing 1960 Dodger Stadium Conditional Use Permit;
- relief from the River Implementation Overlay District, to allow for the construction of several project components (Alameda Station, Alameda Tower, and Alpine Tower);
- relief from Cornfield Arroyo Seco Specific Plan to allow construction and operation of the Chinatown/State Park Station;
- a Development Agreement between the “Project Sponsor” and the City of Los Angeles for 20 years; and,
- “Other discretionary and ministerial permits, approvals, consultations, and coordination will or may be required, including...temporary street closure permits, demolition permits, grading permits, excavation permits, archaeological permits, encroachment permits, building permits, dewatering permits, stormwater permits, noise variances, work hour variances, haul routes, sign permits, any operational agreements...and any applicable permits or clearances related to water and/or energy infrastructure or emergency access.”

(DEIR, pp. 2-61 to 62.)

The vast majority of these “other discretionary and ministerial permits” and other approvals referenced in the DEIR will be made by the City of Los Angeles, since the 1.2-mile-long Project is proposed to be built and operated predominantly on or above City right-of-way. (DEIR, pp. 2-2 and 2-6 [Figure 2-3].)

CEQA strongly prefers to confer lead agency status on an “agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose.” (CEQA Guidelines, § 15051(b)(1).) Metro is an agency with a single purpose, albeit a very important one. But it does not have general governmental powers as the City of Los Angeles does to, for example, grant relief from City land use regulations, create a specific plan, agree to a franchise agreement for Project use of public rights-of-way, enter into a 20-year Development Agreement, or offer any of the “other discretionary and ministerial permits” and approvals necessary for the Project to be ultimately approved.

As the DEIR admits, the City of Los Angeles has direct and exclusive authority over all streets in the City. (DEIR, p. 3.17-1: “All the streets in the Project study area are under the jurisdiction of the City of Los Angeles.”) The required franchise agreement is key to the Project moving forward since the Project operates primarily within the City’s public right-of-way. In addition, it is the *City* that is responsible to ensure the Project’s consistency with the City’s General Plan and its components, including numerous community plans and two existing specific plans, not Metro. (DEIR, pp. 3.11-8 to 3.11-13). Metro has no experience or expertise in evaluating the Project’s consistency with the City’s General Plan or crafting appropriate mitigation measures to address significant conflicts. The City clearly does.

cont'd  
GO8-8

GO8-9

GO8-10

The City is also entirely responsible for any changes *to* and conditions associated *with* the 1960 Dodger Stadium Conditional Use Permit, and for relief from other City land use regulations in the Project area. The City is also responsible for required “temporary street closure permits, demolition permits, grading permits, excavation permits,” etc. (DEIR, p. 2-62.) Metro has no experience, expertise, or authority for a private project over these fundamental City concerns.

GO8-11

Metro does not have the desire (recalling that it has already disavowed Project oversight) or the necessary incentive or expertise to enforce the many Mitigation Measures associated with the Project for components not located on Metro property.<sup>6</sup> This may be one reason Metro has allowed so many of the Project’s proposed Mitigation Measures to be improperly deferred, a subject that will be raised in greater detail in LA Parks Alliance’s (and likely other) comment letters regarding the inadequate DEIR.

GO8-12

Indeed, the DEIR appears to assume that ARTT will prepare all these deferred mitigation plans, not Metro. (See, e.g., DEIR 3.13-68 [Construction Noise Management Plan to be prepared by “Project Sponsor.”] Presumably, it is the City, with its direct construction permitting responsibilities, local ordinances regulating such impacts as excessive construction noise, and expertise in overseeing such plans and mitigation measures, that will perform the required oversight and, if necessary, enforcement. (See, e.g, DEIR’s reliance on LA Municipal Code [i.e., the City] to enforce stormwater runoff prohibitions, pp. 3.10-6.)

GO8-13

The City of Los Angeles has direct regulatory authority over approval of the majority of physical Project components, which are primarily located on or above City land or City public right of way. The City is plainly the “public agency with the greatest responsibility for supervising or approving the project as a whole” and has the “general governmental powers” necessary to make most necessary Project approvals. (CEQA Guidelines, § 15051(b).) Metro has neither the greatest responsibility over the Project nor does it have general governmental powers to make Project approvals. Its approvals are limited to only two locations: one for permission to use Metro-controlled land, and another to cross Metro-controlled airspace.

GO8-14

The City of Los Angeles must be the lead agency.

**B. CEQA Guidelines Section 15051 Subdivisions (c) and (d) are Inapplicable**

CEQA Guidelines section 15051 subdivision (c) only applies “[w]here more than one public agency *equally* meet the criteria in subdivision (b).” It is inapplicable, as the City of Los Angeles is clearly the appropriate lead agency under subdivision (b). Even if subdivision (c) did

GO8-15

<sup>6</sup> These include: Construction Traffic Management Plan [DEIR, p. ES-14], Construction Monitoring Plan (Built Resources) [DEIR, p. ES-40], Cultural Resources Monitoring and Mitigation Plan (DEIR, p. ES-41), Archeological Testing Plan for Alameda Station (DEIR, p. ES-45), Archeological Testing Plan for LAUS Forecourt [DEIR, p. ES-47], Archeological Testing Plan for Los Angeles State Historic Park [DEIR, p. ES-48], Paleontological Resources Mitigation and Monitoring Plan [DEIR p. ES-52], Soil and Groundwater Management Plan [DEIR, p. ES-53], Construction Noise Management Plan [DEIR, p. ES-58, Vibration Monitoring Plan [DEIR, p. ES-67, Temporary Disaster Route Plan [DEIR, p. ES-76], Utility Relocation Plan [DEIR, p. ES-79], and a Fire Protection Plan [DEIR, p. ES-80].

apply, and it does not, between Metro and the City of Los Angeles it is the City that would likely “act first on the project in question” due to the many preliminary approvals necessary for a project of this scope and magnitude. (See list of City approvals required for the Project, DEIR, p. 2-61 to 2-62, and discussion *supra*, pp. 4-6.)<sup>7</sup>

cont'd  
GO8-15

While the project proponent agreed in a private negotiation that Metro may *also* review and approve Project plans for design, construction, and implementation, as ARTT privately admitted to Metro during early discussions about the Project, the statutory duty to review and approve plans for design, construction, and implementation of an aerial tram system properly belongs to Cal/OSHA pursuant to the California Labor Code, not to Metro. (Response to Metro, p. 16, citing Labor Code, §§ 7340-7357.) Moreover, nothing in the Labor Code or other statute requires it to be the *first* action taken on the Project.

GO8-16

CEQA Guidelines section 15051 subdivision (d) is also inapplicable. It applies “[w]here the provisions of subdivisions (a), (b), and (c) leave two or more public agencies with a substantial claim to be the lead agency.” As discussed, here Metro does not have a substantial claim to be the lead agency because it cannot be seen as “the public agency with the greatest responsibility for supervising or approving the project as a whole,” and CEQA strongly prefers the lead agency to have “general governmental powers, such as a city or county, rather than an agency with a single or limited purpose.” (CEQA Guidelines, § 15051(b).) Metro has taken on the role by private agreement with the Project proponent and with the apparent acquiescence of the City, whose former Mayor championed the Project in his role as chair of Metro’s board of directors. Indeed, Mayor Garcetti described himself openly in a recent Metro Executive Management Committee meeting as a “pretty unabashed supporter” of the Project, which raises significant concerns over Metro’s possible precommitment to approve the Project.<sup>8</sup>

GO8-17

### **C. Metro’s Decision to Act as Lead Agency is Inherently Prejudicial and Taints the Environmental Review Process.**

Choice of lead agency is fundamentally important. “[A]lthough applicants may enter into contracts and agreements prior to the completion of the environmental review process, such contracts or agreements *cannot be used to avoid the scrutiny envisioned by CEQA.*” (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 737 [emphasis added].) Thus, where a local agency privately agrees with an applicant to serve as lead agency, or even where local agencies agree amongst themselves to designate one of them as lead agency, if that

GO8-18

FN GO8-15

<sup>7</sup> In fact, the City of Los Angeles already approved a Project-related permit when it issued Permit No. 22020-10000-00312 for ARTT LLC’s gondola exhibit within the Dodger Stadium parking lot. See <https://www.ladbsservices2.lacity.org/OnlineServices/PermitReport/PcisPermitDetail?id1=22020&id2=10000&id3=00312>.

FN GO8-17

<sup>8</sup> See Joe Linton, StreetsBlogLA, *Mayor Garcetti Supports Dodgers Gondola, Disses Project Skeptics Comparing Them To Mitch McConnell*, Sept. 16, 2022, attached as Exhibit A, available at: <https://la.streetsblog.org/2022/09/16/mayor-garcetti-supports-dodgers-gondola-disses-project-skeptics-comparing-them-to-mitch-mcconnell/>.

designation does not follow CEQA’s mandated process, it will be rejected and the environmental review document prepared by the improper lead agency discarded. (See, e.g., *PCL v. DWR*, 83 Cal.App.4th at 907; *see also City of Sacramento v. State Water Resources Control Bd.* (1992) 2 Cal.App.4th 960, 973.)

Metro (and the City of Los Angeles) should take note that CEQA forbids delegation by the properly delegated lead agency to another agency or private entity:

Neither the [California Environmental Quality Act] nor the state guidelines authorize the city council to delegate its review and consideration function to another body. Delegation is inconsistent with the purpose of the review and consideration function since it insulates the members of the council from public awareness and possible reaction to the individual members’ environmental and economic values. Delegation is inconsistent with the purposes of the EIR itself.”

(*PCL v. DWR*, 83 Cal.App.4th at 907, quoting *Kleist v. City of Glendale* (1976) 56 Cal. App. 3d 770, 779.) As plaintiffs successfully argued in *PCL v. DWR*, “appointment of the wrong lead agency taints the entire EIR process, is inherently prejudicial, and compels a fresh start with an appropriate lead agency.” (*Ibid.*)

Metro’s decision through a private agreement with ARTT LLC to take on lead agency status in the environmental review of the proposed aerial tram system is likewise prejudicial and taints the environmental review process. The only remedy is to begin anew under the direction of the properly designated lead agency, the City of Los Angeles.

**D. Public Utilities Code Section 130252 Does Not Change the CEQA Analysis and Neither Requires Nor Authorizes Metro to Serve as Lead Agency.**

The Draft EIR suggests that Public Utilities Code (“PUC”) section 130252 requires the submittal, review, and approval of proposed plans to Metro for design, construction, and implementation of the Project. (DEIR, p. 2-61.) As discussed above, ARTT LLC explained to Metro that “aerial gondolas and tramways are regulated by the California Labor Code, Sections 7340-7357, and the detailed implementation of design, plans, and specifications falls under the jurisdiction of the Department of Industrial Relations, Division of Occupational Safety and Health (“Cal/OSHA”).” (Response to Metro, p. 16.)

PUC section 130252 applies only to “*public mass transit systems* or projects, including exclusive public mass transit guideway systems or projects, and federal-aid and state highway projects.” (PUC § 130252(a) (emphasis added).) This project is *not* a public mass transit project or a mass transit guideway system.<sup>9</sup> The Project is *privately* owned and operated and intended primarily to provide service to and from Dodger Stadium, a private sports and event venue. The

<sup>9</sup> ARTT LLC explained, and LA Parks Alliance agrees, that the gondola Project is “not a ‘transit guideway system’” and thus is not subject to PUC section 130252(a) for that reason. (Response to Metro, pp. 16-17.)

DEIR admits as much: “The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property...” (DEIR, p. 2-12.)

cont'd  
GO8-19

The DEIR’s repeated assertions that Project purposes include providing access to neighborhoods near Dodger Stadium and to LA State Historic Park and its surrounding neighborhoods (see, e.g., DEIR, p. ES-1) are also belied by the DEIR’s gross speculation surrounding these alleged purposes. For example, the alleged access and mobility hub at Dodger Stadium is identified only as a “potential” project component and would be subject to approval by the Dodgers. (DEIR, pp. ES-1.) “The Project Sponsor will *request consideration* by the Los Angeles Dodgers of the *potential for the Dodger Stadium Station to include a mobility hub* where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon.” (DEIR, p. ES-10 [emphasis added].)

GO8-20

The DEIR asserts that the “Chinatown/State Park Station location avoids adjacent private properties while maintaining transit access to surrounding communities within a half mile walkshed to transit, including the Park, Chinatown, Mission Junction including William Mead Homes, Los Angeles River, and North Broadway.” (DEIR, p. 2-22.) First, access from Union Station to these neighborhoods are already provided by Metro’s Gold Line Chinatown Station, which is located approximately 100 yards from the Project’s proposed Chinatown/State Park Station. Second, and perhaps more important, the use of the Project to duplicate this access via the proposed gondola outside of Dodger games and events is entirely speculative, and is based entirely on demand. “It is anticipated that the proposed Project operations would vary the number of cabins in service and speed throughout the day, based on demand.” (DEIR, p. 2-42.) Nothing in the DEIR suggests the gondola will operate on a minimum schedule, as Metro’s Gold Line does.<sup>10</sup> ARTT LLC or another operator could choose not to run the gondola at all if demand is insufficient.

GO8-21

Even if these currently speculative components were certain to become part of the Project, they would not magically transform it into a public mass transit system. A project owned and operated by a private person or entity for the primary purpose of providing transportation to an entirely private destination is *not* a public mass transit system. As a private transportation project, and as ARTT LLC admitted in its responses to Metro, the Project is not within the scope of PUC section 130252. And even if PUC section 130252 did apply, it has very limited scope.

GO8-22

PUC section 130252 subdivision (a) provides that:

All plans proposed for the design, construction, and implementation of public mass transit systems or projects, including exclusive public mass transit guideway

FN GO8-21

<sup>10</sup> Metro’s Gold Line schedule provides weekday service on its Northbound segment from Union Station to Citrus College every 12 minutes or less for most of the day between 4am and 12:50am. The weekend schedule is the same hours, with only slightly less frequent service. See <https://www.metro.net/riding/schedules/?line=804>.

systems or projects, and federal-aid and state highway projects, shall be submitted to the commission [i.e., Metro] for approval.

But PUC section 130252 subdivision (c) substantially limits the meaning of subdivision (a): “As used in this section, “plan” means a project description and *not* the detailed project plans, specifications, and estimates.” (Emphasis added.) The Project applicant has privately agreed with Metro that it may *also* review and approve Project plans for design, construction, and implementation. (See Response to Metro, p. 16.) As already discussed, however, the primary oversight authority for detailed review of plans for design, construction, and implementation of an aerial tramway project is held by Cal/OSHA, not Metro. Moreover, the DEIR does not cite to any authority authorizing or permitting Metro to *supervise* the Project.

cont'd  
GO8-22

Metro’s and the DEIR’s citation of PUC section 130252 does not change the mandated CEQA process to determine the appropriate lead agency for the proposed Project.

## CONCLUSION

As the DEIR acknowledges, “a lead agency has an obligation to balance the economic, social, technological, legal, and other benefits of a project against its significant unavoidable impacts on the environment.” (DEIR, p. 1-2.) Metro certainly has authority as a *responsible* agency to consider the manner the proposed Project will relate to the important public resources over which it exercises control and oversight. But Metro is not well-situated to be the lead agency charged with the duty to make these balancing considerations over the many public resources that are not within its ambit.

GO8-23

Metro approvals for this Project will be required to allow construction and operation of the Project within a portion of Los Angeles Union Station and within Metro’s Gold Line right-of-way. (DEIR, p. 2-61.) It is significant that the DEIR has determined no Mitigation Measures are necessary to protect these public resources. But there are numerous Mitigation Measures proposed to protect other public resources and members of the public in the City of Los Angeles. (See footnote 5, p. 6.) The City is far better situated to act as lead agency than Metro, and since it is directly political accountable to its constituents, is better positioned to balance the alleged Project benefits against its significant unavoidable environmental impacts and ensure that Mitigation Measures to protect the people and resources of Los Angeles are properly monitored and enforced.

The City of Los Angeles must serve as lead agency for the proposed Project, not Metro.

Sincerely,



John Given



Metro—LAART Project

December 19, 2022

p. 11

Cc (by email only):

Supervisor Hilda L. Solis, LA Board of Supervisors (First District)

Mayor Karen Bass, City of Los Angeles

Councilmember Eunisses Hernandez, LA City Council (District 1)

City Attorney Hydee Feldstein Soto, City of Los Angeles

**From:** LA Union Station HS <laushs@earthlink.net>  
**Sent:** 1/6/2023 1:28:24 AM  
**To:** la art <LAART@metro.net>  
**Subject:** Ref: 1/5/2023 updated letter opposing LAART

Hello "dinny" this is the letter I sent.

Regards,  
Tom Savio, Executive Director,  
[www.launionstationhs.org](http://www.launionstationhs.org)



**LOS ANGELES UNION STATION HISTORICAL SOCIETY**

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626-799-3925

January 5, 2023

Mr. Cory Zelmer  
Deputy Executive Officer  
Los Angeles County Metropolitan Transportation Authority  
1 Gateway Plaza, Mail Stop 99-22-6  
Los Angeles, CA 90012

**Ref: Updated Amended and Revised Comments Opposing LAART’s “Gondola” DEIR 1/5/2023**

Dear Mr. Zelmer,

The Board of Directors (The Board) of the Los Angeles Union Station Historical Society (LAUSHS), a non-profit, Federal Railroad Administration Section 106 historic preservation consultant for Los Angeles Union Station (Union Station), a world recognized National Historic Landmark owned by Los Angeles County Metropolitan Transportation Authority (Metro), has voted to formally **comment against** Los Angeles Aerial Rapid Transit’s (LAART) private, for-profit cable car line (aka “**Frank McCourt’s Gondola**”) and its public land and air rights development scheme that proposes to link Union Station and Metro’s related “Esplanade-Forecourt” project with Dodger Stadium that The Board believes is contrary to Metro’s public participation policy and an **illegal (pending a Superior Court decision) “accommodation” for LAART**. The Board believes that LAART’s proposed **futuristic/Carnaval-like Union Station Terminal** on Alameda Street and Metro’s supporting “Esplanade-Forecourt” project **will blight the viewscape** of the historic and architecturally significant west facade of Union Station, and that Union Station, its trains and patrons could be **physically harmed** if aircraft from the nearby Los Angeles Police Department’s “Hooper Memorial Heliport” airport were to be entangled in LAART’s overhead cables, gondolas and 13-story towers. Furthermore, **The Board opposes Metro’s planned removal of all “Disabled Parking” spaces** from the “Esplanade-Forecourt” area, without public hearings and reasonable alternatives, to accommodate a new so-called “water feature” (a fogging-type water fountain) which would cool LAART patrons cued-up for their cable car rides to Dodger Stadium. Moreover, the water feature would be **contrary to the state’s water conservation policy**. (Even if the water feature recirculates, **at least 10% of its water will be lost to evaporation day after day, year after year.**)

Until now, The Board has steadfastly refused to take sides in the above major, billionaire development scheme. However, in The Board’s opinion, **Metro and its staff have obviously taken a pro-active role supporting LAART, a potential competitor of Metro’s efficient “Dodger Stadium Express” bus service**, as well as planning to **“gild the lily” of Union Station** with its Esplanade-Forecourt Project, all **“backstage,”** using public land, resources and airspace but **without public participation** as required by Metro policy and the law, before METRO agreed to be “engaged” by LAART.

Among the reasons for The Board’s opposition are, but not limited to:

GO9-1

A) Metro Board member, the former **Mayor of Los Angeles Eric Garcetti, who originally introduced the motion for Metro to assist LAART without public participation** and to enlist Metro staff to "carry LAART's water" as it were, did receive, according to public records, **millions of dollars** in both "behest payments" and political cash contributions **from Billionaire real estate and LAART developer Frank McCourt** and/or his family and various entities and associates, which in The Board's opinion, is an apparent **conflict of interest**. Consequently, **Metro is being sued** by the non-profit California Endowment for willfully preventing public participation in Metro's decision to partner with LAART. **(Ironically, Metro is using public resources to defend itself, for not allowing public participation, before the Superior Court.)**

GO9-2

B) In The Board's opinion, **Metro Deputy Executive Officer Cory Zelmer and/or subordinates and consultants falsified an official environmental document--LAART's Draft Environmental Impact Report (DEIR)--**by checking-off the DEIR box that states there is **no airport within 2 miles [3520 yards]** of LAART's proposed Union Station Terminal, when he had been informed repeatedly to the contrary by The Board. Moreover, The Board presented proof to Zelmer and his superior, Metro CEO Stephanie Wiggins, that the Los Angeles Police Department's "Hooper Memorial Heliport" (variously described as the country's or the world's busiest airport for rotary-winged aircraft aka helicopters) **is only 1/2 mile (880 yards)** from LAART's proposed Union Station Terminal. Furthermore, The Board reminded Zelmer and Wiggins that **according to the Los Angeles Police Department, the California Department of Transportation, the California Public Utilities Commission, the Federal Aviation Administration, and the 8th U.S. Circuit Court of Appeals, all heliports are airports** officially defined as a location where any flying machine is serviced. The fact that some airports serve only rotary-winged aircraft (helicopters) while others serve fixed-wing aircraft (conventional-winged aircraft) does not change the fact that: **all heliports are airports in the eyes of all governing agencies and the Federal Courts**. Furthermore, the argument presented by Metro that Hooper Memorial is a police facility, not a civilian facility, and therefore not subject to the LAART DEIR, is **illogical and fallacious**. A helicopter that becomes entangled in LAART's cables, gondolas and 13-story towers and consequently **crashes into Union Station, and/or its trains and patrons, could cause catastrophic harm** regardless had that aircraft launched from a police facility or a public facility. Simply put, **LAART's proposed location is not safe** for the Union Station community and helicopters from Hooper Memorial Heliport airport. Please note, the *Rules and Regulations of Los Angeles Union Passenger Terminal* (Union Station's original name) has for decades declared: **"General Notice A. Safety is of the first importance in the discharge of duty."** Or did Metro abolish this paramount railroad safety rule when it bought Union Station?

GO9-3

C) Contrary to the promises made to The Board by Stephanie Wiggins, Cory Zelmer and LAART, **no meeting has ever been organized between them and The Board to discuss the difference of opinions concerning the nature of LAPD's Hooper Memorial Heliport airport and the proposed location for LAART's Union Station Terminal**. In fact Metro forbade **The Board's examination of the only known 3-D scale model of Union Station's location** because, in The Board's opinion, of a **deliberate subterfuge** that the model dating from former Union Station owner--the Santa Fe Railway--was too old to be accurate today, and furthermore the sharing of the model with The Board would **somehow be a "conflict of interest" (?)** even though The Board previously had access to the model. However, The Board's use of the model did not depend on the model's age, but only the juxtaposition of Union Station with Alameda Street which has not changed appreciably since the station was opened in 1939. Consequently, at a loss for options, The Board asked LAART to produce a 3-D scale model given its apparent resources, but **LAART never responded. This "shadow play,"** in The Board's opinion, was being **performed by LA Metro and LAART to obfuscate the issues and delay public criticism** of LAART contrary to the public weal which Metro is obliged to serve. Furthermore, since the model is public property, The Board's use should have been permitted so it could be compared to LAART's distorted artist's rendering of its Futuristic/Carnaval style Alameda Street Terminal with Union Station's Hispanic-Cathedral style. Finally, after wasting The Board's time and resources for over a year, in December 2022 Metro provided to the public an aerial diagram of LAART's Alameda Terminal that is in the **worst possible viewscape location--directly in front of Union Station!** Cable car rides have their place but **not in front of Los Angeles' world famous "Cathedral of Transportation."**

GO9-4

D) In The Board's opinion, LAART is designed to compete with Metro's "Dodger Stadium Express," a highly efficient road service that could be further improved **if Metro switched to modern, environmentally friendly motor coaches** that might funded by the savings from not building its Esplanade-Forecourt project. GO9-5

E) Given the seasonal nature of baseball, it is also The Board's opinion that **LAART is a "Trojan Horse" scheme** to facilitate year-around, for-profit real estate development in Dodger Stadium's vicinity **at the expense of public land and airspace, the viewscape of Union Station and safety.** GO9-6

F) Metro's proposed Esplanade-Forecourt project, according to Metro employees--who wish to remain anonymous for the sake of their careers--will be funded by so-called **"overlap money"** that was **"peeled-off" from Metro's defunct LINK-US project** that itself was rejected because of The Board's and the public's opposition. Moreover, Metro has stated to The Board's Executive Director via telephone that ultimately the Esplanade-Forecourt project will come to fruition by a two-step process eliminating all public parking including **"disabled parking"** from in front of Union Station **without public comment or participation in violation of the Americans with Disabilities Act (ADA). (A disabled motorist has already filed a formal complaint with the ADA authorities against Metro's Esplanade-Forecourt project.) Step one would be the "temporary" elimination** of all Union Station west front parking for the construction vehicles needed to build the Esplanade-Forecourt project followed by step two--well there really isn't a step two--**when the project is completed the parking spaces would be left permanently removed.** Not only will this **negatively impact the "disabled parking" but also the parking for Metro's tenants** the Homebound Restaurant and Brewery, TRAXX restaurant and the numerous social and artistic events that take place in the great **"Ticketing Hall"** which has fallen from use with computerized ticketing. Furthermore, according to a retired Metro staff person, the Esplanade's so-called "water feature" (a fogging-type water fountain) **will likely attract more "homeless" citizens seeking "showers"** contrary to Metro's stated policy--according to former Metro Union Station supervisor the late Ken Pratt--of not catering to the needs of the "homeless." In The Board's opinion, Metro's Esplanade-Forecourt project is designed to cool future LAART and adjacent **Olvera Street tourist attraction visitors** as they saunter between Union Station, LAART and Olvera Street. (While Olvera Street's right-of-way and some of its structures and art works are historic, the **"Olvera Street tourist attraction" per se was invented in 1930** by a husband-and-wife real estate development team who went on to develop Los Angeles' **"New Chinatown tourist attraction."** (Ironically, **Old Chinatown was demolished in a racist bid to rid Los Angeles of the Chinese who settled after building the railroad to Los Angeles, then Union Station was built on top of Old Chinatown's rubble.**) GO9-7

G) Finally, building the Esplanade-Forecourt project's water-feature in semi-desert Los Angeles has been **experiencing one of its worst multi-year droughts in history flies in the face of the State of California's policy to conserve dwindling water resources.** One only needs to recall the classic Los Angeles-based movie **"Chinatown"** to understand what The Board believes is driving LAART and Esplanade-Forecourt schemes--**the greed of land developers, the greed of Metro careerists and ultimately the greed of local politicians!** Or, to paraphrase the immortal Yogi Berra: **"It's 'Chinatown' (the movie) all over again."** GO9-8

For the above reasons, but not necessarily only because of them, the Board of Directors of the Los Angeles Union Station Historical Society **opposes construction of LAART and the related Esplanade-Forecourt projects in the interests of honest government, Los Angeles Union Station preservation, the environment and above all safety.** GO9-9

Respectfully,

Thomas R. Savio  
Executive Director  
Los Angeles Union Station Historical Society

Cc: Stephanie Wiggins, Metro CEO

January 9, 2023

Mr. Cory Zelmer  
Deputy Executive Officer, Metro  
One Gateway Plaza, Mail Stop 99-22-6  
Los Angeles, CA 90012

Dear Mr. Zelmer:

Thank you for allowing the opportunity to comment on the draft Environmental Impact Report for the Los Angeles Aerial Rapid Transit (LAART) project, released in October.

California State Parks Foundation is an independent, member-supported nonprofit dedicated to protecting and preserving the California state park system, for the benefit of all. Since our founding in 1969, we have endeavored to ensure that every unit of the California state park system is open, welcoming and provides a high-quality recreational experience for the public; and that the irreplaceable natural and cultural wonders of the system are stewarded for future generations to enjoy.

We have taken an interest in the LAART project because of its impact on Los Angeles State Historic Park. The proposed project would cross over the western edge of the park and include a new station adjacent to the current Chinatown station on the Metro Gold Line, as well as a junction just to the northwest on Broadway.

Los Angeles State Historic Park formally opened in 2017 after decades of advocacy by the surrounding community – neighbors in Chinatown wanted a park and they did not rest until this green oasis was created. Today when you visit Los Angeles State Historic Park, you see people exercising and walking their dogs, relaxing on the grass, taking in the stunning view of the downtown skyline, and participating in community activities like exercise classes or arts and crafts. It is a peaceful gathering spot that provides desirable amenities to its low-income neighbors, and one that represents a true respite from its urban surroundings.

We are concerned that the construction and operation impacts of the project may permanently alter the peaceful experience of the park. First, the project would require amending the General Plan for the park to include transportation as an acceptable use – a worrisome precedent for other parks in the system. Too often, parks are seen as empty spaces that can be used for infrastructure like roads and power lines. We remain absolutely committed to pushing back against that thinking whenever and wherever it occurs, because parks are already essential infrastructure for health, wealth, and quality of life.

Noise is another concern – impacts will be unavoidable and significant during construction, which is bad enough. The draft EIR also finds that the system will generate between 61 and 64 decibels of additional noise during regular operation. This is just below levels that can affect health in the form of noise pollution, so it's another issue we'll be watching closely.

Finally, it is very difficult to tell from the materials that have been released thus far what the impact of the proposed project will have on the park's views and vistas. While we understand that some of these concerns are beyond the scope of what is required in an Environmental Impact Report, park vistas are an important part of the experience at Los Angeles State Historic Park. We request that California State Parks and Los Angeles Metro prepare a set of visuals that show what park visitors in

GO10-1

GO10-2

GO10-3

GO10-4

GO10-5

*Champion Your California*

the southwestern third of the park would see and experience at ground level after the proposed project is constructed.

Proponents of the project seem to believe that the potential of taking cars off the road is worth any potentially serious impacts to the park's visitor experience. To us, this is a false choice – in Los Angeles, as in most urban areas in California, it is increasingly expensive to carve out additional green open spaces, even though we know that these spaces are vital to the quality of life and health of the surrounding community. We ask that you commit to additional efforts to study and fully understand the proposed project's impact on the park's General Plan, ambient noise and views prior to any action to approve and implement this project.

Thank you for the opportunity to offer these thoughts and concerns. I would be happy to discuss them further should you have questions.

Sincerely,



Rachel Norton  
Executive Director  
California State Parks Foundation

cont'd  
GO10-5

GO10-6

**Champion Your California**

**From:** LA Union Station HS <laushs@earthlink.net>  
**Sent:** 1/18/2023 12:49:40 AM  
**To:** la art <LAART@metro.net>  
**Subject:** Comments against LAART's Gondola Project and Cathedral High School Meeting

Dear Mr. Zelmer, the attached are the comments against the Draft EIR and the recent Cathedral High School meeting. Respectfully, Thomas R. Savio, Executive Director, Los Angeles Union Station Historical Society.





**LOS ANGELES UNION STATION HISTORICAL SOCIETY**

P.O. Box 411682, Los Angeles CA 90041  
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January 17, 2023, 3PM PST

Mr. Cory Zelmer  
Deputy Executive Officer  
Los Angeles County Metropolitan Transportation Authority  
1 Gateway Plaza, Mail Stop 99-22-6  
Los Angeles, CA 90012

**Ref: Comments and Complaints against LAART, its Draft Environmental Report and DEIR meeting at Cathedral High School**

Dear Mr. Zelmer,

I was present at the meeting hosted by you, and/or LA Metro, Frank McCourt, Los Angeles Aerial Rapid Transit, ClimateResolve, Cathedral High School and Does 1 to 10. I attended as the representative of the Los Angeles Union Station Historical Society (LAUSHS). Here are my recollections that in my opinion bring into question the legitimacy of the meeting:

- A) Although I arrived at Cathedral High School meeting venue at the beginning of the meeting, I was delayed by thirty minutes getting to the venue because there was no **Disabled Parking** in or around Cathedral High School. (This has since been confirmed by Cathedral High School staff.) Consequently, I was late because I am a **Disabled Person**, and since all normal street parking was occupied by residents and/or meeting participants, I was obliged to park on the sidewalk after driving about for nearly 30 minutes, in fear of not representing the views of the LAUSHS. Consequently, I waddled with cane in hand to the distance to the meeting. This, in our opinion, a reasonable person would conclude that Mr. Zelmer and/or other “hosts” do not care about providing reasonable accommodations for **Disabled Persons** and myself. Furthermore, it indicates to us Mr. Zelmer’s indifference to the **Disabled** and/or his **incompetence** in hosting same at the public meeting.
- B) When I finally entered the meeting, it had the appearance and sound of a **near riot**. I was told by bystanders that the spontaneous demonstration was because Mr. Zelmer and other hosts refused to take any questions of the 70 to 100 members of the local community in attendance. It is our opinion that a reasonable person might conclude that Mr. Zelmer is incompetent in representing Metro, and LAART in a public forum.
- C) Furthermore, the working press and Community representatives said that they were told to ask Brother John Montgomery, Principal of Cathedral High School for answers to their questions on LAART. Brother John is not to our knowledge a credentialed transit or environmental expert. (All known nonaligned experts and the Sierra Club are against the Gondola.) Brother John then extolled to them via nation-wide TV, the reasons he saw for building the Gondola, without mentioning the pertinent fact that his employer, Cathedral High School, gets significant funds from Frank McCourt, an apparent conflict of interest in our opinion.
- D) Therefore, the Los Angeles Union Station Historical Society has concluded that given all the above, the legal validity of the meeting was compromised and that a new meeting should be rescheduled with a live democratic

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give-and-take on the issues, better crowd control and hosted by an uncompromised Metro meeting expert, not Mr. Zelmer who a reasonable person might conclude is compromised by an apparent conflict of interest in that he is a Metro employee in charge of investigating the Gondola project for the public weal whilst his salary is gifted to Metro by the Gondola's chief antagonist Frank McCourt.

Respectfully,

/s/

Thomas R. Savio  
Executive Director,  
Los Angeles Union Station Historical Society

Cc. Stephanie Wiggins, Metro CEO

cont.  
GO11-5



January 17, 2023

**VIA EMAIL LAART@metro.net**

Cory Zelmer  
Deputy Executive Officer  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Mail Stop 99-22-6  
Los Angeles, CA 90012

Re: Comments on LA ART Draft EIR dated October 2022

Dear Mr. Zelmer:

The Sierra Club submits this letter to set forth its comments and concerns regarding the LA ART Draft EIR.

GO12-1

***Executive Summary (“ES”) 1 Introduction:*** At the outset, LA Aerial Rapid Transit Technologies LLC is identified as the Project Sponsor. While neither the ownership or management of this LLC is specified in the Draft EIR, we understand from news reports<sup>1</sup> and multiple other sources that the project is promoted by Frank McCourt, who in turn is a 50 percent owner of the Dodger Stadium Parking Lot.

The Introduction sets forth the conclusion that Metro is the “lead agency” and as such has the authority to approve the project and implement mitigation measures. However, significant concerns have been raised by The California Endowment and the LA Parks Alliance that Metro is not in fact the appropriate “lead agency” for the LA ART, particularly as the proposed project for the stadium parking lot is private in nature. Rather, the City of Los Angeles is the appropriate lead agency on the basis of its general governmental powers and its direct accountability to its constituents. We concur with these concerns and particularly express concerns with the dedication of Metro’s employees and significant resources to this private project.

GO12-2

FN GO12-1

<sup>1</sup> *Challenges Loom for gondola to Dodger Stadium planned for 2028 Olympics*, LA Times 1/9/23; *LA’s Transit Infrastructure Can Always Get Dumber: Meet the Gondola* (<https://knock-la.com/las-dumb-gondola/>)

**ES 2 Project Purpose/ES 5 Project Overview:** There is significant doubt as to whether the LA ART would alleviate congestion and air pollution, which in turn is a fundamental premise of the Draft EIR. The UCLA Mobility Lab Study dated October 24, 2022 concludes the gondola will do little to reduce traffic and green-house gas emissions. We concur with the concerns raised by the study. The study also casts significant doubt on the Draft EIR Section 1.0 conclusion that LA ART is an “environmental leadership transit project” that is in turn entitled to streamlined judicial review.

GO12-3

In particular, the multiple Draft EIR references to the “5,000 people per hour” gondola capacity are refuted by the UCLA Mobility Lab Study. The Draft EIR further assumes patrons would use the gondola both before and after events.<sup>2</sup> However, the study (and common sense) indicate that many stadium attendees are not likely to wait for the gondola following games and concerts and will instead use the express bus or ride share services back to LAUS or to other destinations. Moreover, the “5,000 people per hour figure” gondola capacity figure does not reflect non-event day or off-season usage. The UCLA Mobility Lab Study concludes very few people would use the gondola as a form of transportation outside of travel to/from games.<sup>3</sup> Any discussion in the Draft EIR relating to gondola ridership and the estimated reduction in vehicle miles travelled must take these two factors into account.

GO12-4

The Draft EIR is also incomplete and lacking in transparency in that it is focused solely on the gondola. Neither the Purpose nor Project Overview discussions address commercial developments apparently contemplated by Mr. McCourt for the stadium parking lot or how the parking lot might ultimately be reconfigured to allow commercial development.<sup>4</sup> We concur with the concern that the gondola is essentially a private project that is proposed to be built using public resources and over public rights-of-way and publicly owned property. The failure to address commercial development of the parking lot and resulting increase in traffic and greenhouse gas emissions from development renders it impossible to evaluate the overall impact of the proposed project on traffic and greenhouse emissions. Consequently, the conclusions on ES page 53 and elsewhere in the report that construction and operations of the LA ART would have a “less than significant impact” on greenhouse gas emissions are not supported.

GO12-5

GO12-6

GO12-7

Moreover, the LA ART does not serve any broad public purpose. The suggestion that the gondola might possibly serve communities near LAUS and Dodger Stadium is not persuasive. These communities are within walking, biking, or Dash bus ride distance of LAUS, State Historic Park and the Stadium. The communities may also be served by the Metro Micro on-demand rideshare service that is already operating in many other Los Angeles communities including the Highland Park/Eagle Rock/Glendale service zone.

GO12-8

FN GO12-4 | <sup>2</sup> This flawed assumption is carried through in the report’s 2026 projection of 6,000 riders and 12,000 round trips and the 2042 projection of 10,000 riders and 20,000 round trips.

FN GO12-4 | <sup>3</sup> Excepting employees, Dodger Stadium is nearly empty on days when there is no game or concert. Park goers have found their way to Elysian Park for decades without a gondola.

FN GO12-5 | <sup>4</sup> This lack of detail on the critical topic of commercial development contrasts with other topics that are covered in excruciating detail.

The Draft EIR highlights gondolas operating in various foreign countries such as Bolivia and Mexico, but it does not describe the Portland Aerial Tram or NYC’s Roosevelt Island Tramway. The Portland Aerial Tram is actually operated for the public benefit, i.e., primarily for patients, students and staff commuting year-round between two Oregon Health and Sciences University locations and incidentally for the general public.<sup>5</sup> Similarly, the Roosevelt Island Tramway provides daily commuter transportation between Roosevelt Island and the Upper East Side of Manhattan and primarily serves workers. The Portland and Roosevelt Island tram services can serve as templates for Los Angeles’s broader public purposes such as transportation to our major year-round employment centers, medical facilities and already existing year-round entertainment/cultural centers *and* reduction of greenhouse gas emissions.

GO12-9

***ES 7 Proposed Project Alignment - Impact on State Historic Park and Views:***

The City of Los Angeles should jealously guard and preserve the jewel that is State Historic Park rather than permit the diminishment of this public open space.<sup>6</sup> The construction and operation of the Chinatown/State Park station on park land is at complete odds with these goals of protection and preservation. The Draft EIR contemplates at Section 2.9.4 that the Chinatown/State Park Station would have a footprint of 2,605 square feet including 2,195 square feet within the southernmost part of State Historic Park.<sup>7</sup> Further, the station canopy would have an overhang of 9,320 square feet over the park. Eighty-one trees would need to be removed (including 75 from the park and six from the public right-of-way adjacent to the park) with an unspecified number of trees to be replaced. The station would thus encroach on the park and eliminate a significant amount of park space and open sky view. This assumes LA ART is able to obtain the requisite approvals from the California Department of Parks and Recreation for the proposed uses.<sup>8</sup> Such approval is not feasible, as state park historic units may only include facilities that “are required for the safety, comfort, and enjoyment of the visitors, such as access, parking, water, sanitation, interpretation, and picnicking.”<sup>9</sup> A gondola boarding station and tower are not required for these park visitor purposes.

GO12-10

GO12-11

The Draft EIR notes that one of the principles in the Park’s General Plan is to “Promote a ‘Touchstone Landscape’ for Reflecting on Los Angeles’ Natural and Cultural Heritage” by making the Park a place of inspiration, reflection and appreciation of history and nature through the interpretation of the Los Angeles River.”<sup>10</sup> Installing a massive gondola tower and station within State Historic Park for a sports stadium destination does not comport with

GO12-12

FN GO12-9<sup>5</sup> See gobytram.com for information on Portland’s tram service.

FN GO12-10<sup>6</sup> Likewise, the City should focus on preserving the El Pueblo de Los Angeles Historical Monument (also a State Park) and not permit the construction and operation of the Alameda Street terminal adjacent to this historical monument, Olvera Street and associated architectural structures.

FN GO12-10<sup>7</sup> Elsewhere the Draft EIR only indicates that the Chinatown/State Park Station would be constructed “partially” within the park boundaries without specifying the square footage.

FN GO12-11<sup>8</sup> Draft EIR Section 2.10.

FN GO12-11<sup>9</sup> Cal. Public Resources Code section 5019.59.

FN GO12-12<sup>10</sup> Draft EIR Page 3.4-3.

this inspirational principle. Rather, it is an abuse of public land designated for this historic purpose and for open space values.

cont'd  
GO12-12

We also disagree with the Draft EIR conclusions that the LA ART “would not substantially degrade the existing visual character or quality of public views . . . of the site and its surroundings and the impact would be less than significant”, particularly as these conclusions apply to State Historic Park, the Broadway Junction and Dodger Stadium.

GO12-13

The proposed Chinatown/State Park Station and massive three level, 98-foot tower at the station are completely at odds with the existing park entrances, landscaping, layout and amenities, which provide pedestrians and bicyclists with a beautiful, restorative atmosphere. The proposed station and the 98-foot tower would detract from the park’s stunning views of the downtown skyline<sup>11</sup> to the south and the San Gabriel and San Bernardino Mountains to the north. The Draft EIR authors concede at Page 3. 1-43 that the “Chinatown/State Park Station is a new and large visual element in the landscape, and views of residents would already be altered noticeably”. The report’s authors go on to suggest at Pages 3. 1-43 and 3. 1-46 that the noticeable alterations created by the station would not be so bad because residents and park goers would be compensated by a “potential” mobility hub, 740 square feet of new concessions, restrooms, landscaping and hardscaping, pedestrian improvements and “potential” seating. But this is no consolation at all because State Historic Park already offers *all of these features* including an in-park restaurant and many other restaurants easily within walking distance. The suggestion that the park’s scenic views should be compromised for a little more landscaping and hardscaping in a beautifully landscaped/hardscaped 32-acre park is not persuasive. Likewise, the Draft EIR suggestion at page 3.1-45 that “existing views of downtown from within the park are already interrupted under existing conditions by trees and intervening development” does not justify the additional massive and continuous gondola interruptions proposed by LA ART (assuming for purposes of argument only that trees constitute an interruption of the view).

GO12-14

GO12-15

GO12-16

Even though the Chinatown/State Park Station is proposed to allow passenger boarding, the Draft EIR makes no reference to parking for passengers boarding at the station. State Historic Park is already served by the Metro Chinatown station (located within yards of the park’s beautiful main entrance!) and nearby LAUS and thus the park would not benefit much from the proposed boarding station.<sup>12</sup>

GO12-17

Moreover, the proposed alignment of the gondola directly over a long stretch of State Historic Park (and thus over park goers) and directly over and past private residences is invasive and contrary to current recreational and residential uses. The Draft EIR indicates cabins near the Broadway Junction would “be constantly moving in and out of view”<sup>13</sup> and

GO12-18

FN GO12-14 | <sup>11</sup> As noted in Section 2.3.4 of the Draft EIR, “[v]iews of the downtown Los Angeles are available from the majority of the Site.”

FN GO12-17 | <sup>12</sup> State Historic Park and the nearby Mission Junction neighborhood would benefit from the addition of one or more pedestrian crosswalks across North Spring Street, a far less expensive and invasive solution than the gondola.

FN GO12-18 | <sup>13</sup> Draft EIR Page 3. 1-48.

could be seen from residents and yards and from inside their residences. The resulting disturbance and intrusion to park goers and nearby residents would persist during construction and year-round, daily gondola operation.

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GO12-18

The proposed 179-foot Stadium Tower and massive 37,000+ square foot Dodger Stadium Station are completely at odds with the character of Elysian Park<sup>14</sup> and the Stadium’s peaceful park setting.<sup>15</sup> The Draft EIR does not in our view adequately address any of the foregoing concerns.

GO12-19

**ES 8 System Operations; Costs?:** The Draft EIR does not specify how construction or post-construction operating, security, maintenance costs and power costs would be funded and paid, even though it is specified that all these elements would be required for proposed daily operation. Apparently, this lack of specificity arises because financing has not been fully worked out.<sup>16</sup> This of course raises the issue of whether taxpayers will end up footing these year-round costs for the McCourt family’s private gain.

GO12-20

**ES 11 Alternatives to Reduce Significant Impacts:** We concur with the Draft EIR in one respect, namely, the TSM Alternative, which contemplates enhancing the Dodger Stadium Express Service, is the Environmentally Superior Alternative, particularly when operated with zero emission buses.

GO12-21

However, the TSM Alternative is not addressed adequately in the Draft EIR. No doubt the existing Express Service can be expanded in size and staging locations. The operation of the massive Park and Ride and Bowl Shuttle bus service between the Hollywood Bowl and various sites in the city during the concert season (including bus only lanes) demonstrates the viability of expanding the Dodger Express Service.

GO12-22

Moreover, the development of an off-site loading facility for the TSM Alternative would be far less disruptive to State Historic Park and surrounding communities than the LA ART. In fact, the TSM Alternative would not have any impact on the park. As for bus lanes, Cesar Chavez and Broadway lane closures and diversions are already utilized on game days and expansion of such lanes appears viable. The LA Zoo parking lot provides an excellent bus loading/unloading location.

GO12-23

The Spring Street Alignment, which contemplates the construction of a gondola station within Historic Park, is mentioned as an alternative. This alignment is unacceptable in our view, as it would destroy part of this refuge that was over 17 years in the making and block part of the open sky above the park.

GO12-24

FN GO12-19

<sup>14</sup> As described in Section 2.3.1 of Draft EIR, Elysian Park is the oldest and second largest park in the City.

<sup>15</sup> Tommy Lasorda nicknamed the stadium “Blue Heaven on Earth.” [https://en.wikipedia.org/wiki/Dodger\\_Stadium](https://en.wikipedia.org/wiki/Dodger_Stadium).

FN GO12-20

<sup>16</sup> “It remains unclear how LA ART will be funded, or how much of the price tag will be passed onto taxpayers through Metro’s sponsorship.” *LA’s Transit Infrastructure Can Always Get Dumber: Meet the Gondola* (<https://knock-la.com/las-dumb-gondola/>); “Gondola operations would likely be funded largely by corporate sponsorships and tourist fares, said Nathan Click, a spokesperson for the group [Climate Resolve]. But the financing plan is still being worked out.” <https://www.latimes.com/california/story/2023-01-09/challenges-loom-for-gondola-to-dodger-stadium-planned-for-the-olympics>

Other transportation related alternatives that would serve to conserve energy and reduce green-house gas emissions are (i) the construction of solar panels in the stadium parking lot, (ii) the addition of electric vehicle charging stations and bike share facilities in the lot and (iii) the expansion of the Dash bus service to Elysian Park and State Historic Park. These alternatives are not mentioned in the Draft EIR, which apparently was drafted to present the gondola as the only option. It is not.

GO12-25

**ES 12 Design Options:** Design and Use Option E, contemplating the construction of a pedestrian bridge in Historic Park, is attractive but clearly may be accomplished without construction of the gondola.

GO12-26

**ES 13 Summary of Environmental Impacts:** Contrary to this summary, the proposed 98-foot tower at the Chinatown/State Park Station would in fact block and degrade part of the scenic vista and view of the downtown skyline that is observable from Historic Park.

GO12-27

In sum, the Draft EIR is incomplete and inaccurate in significant respects and lacking in transparency. It misrepresents the potential impact of the LA ART on ridership and the reduction of greenhouse gas emissions. There are better and less intrusive ways to transport people to and from Dodger Stadium, Elysian Park and surrounding communities while also preserving and even improving State Historic Park and these communities. Any gondola built within the City of Los Angeles must serve a much broader public purpose than moving passengers between LAUS and Dodger Stadium.

GO12-28

We welcome the opportunity to meet with you to discuss these concerns.

Sincerely,



Chair, Central Group (Los Angeles)  
Angeles Chapter  
Sierra Club

Copies:

Mayor Karen Bass  
Supervisor Hilda L. Solis, First District  
Councilperson Eunisses Hernandez, District 1  
The California Endowment, 1000 Alameda Street., Los Angeles, CA 90012  
LA Parks Alliance





January 17, 2023

Via Electronic Mail  
([LAART@metro.net](mailto:LAART@metro.net))

Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza, Mail Stop 99-22-6  
Los Angeles, CA 90012

**RE: Comments on the Draft Environmental Impact Report for the Los Angeles Aerial Rapid Transit Project**

Dear Mr. Cory Zelmer:

We appreciate the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Los Angeles Aerial Rapid Transit Project (“Project”). These comments are on behalf of the Natural Resources Defense Council and our many thousands of members and activists throughout California. Our comments are offered to ensure Metro’s consideration of the Project complies with the California Environmental Quality Act (“CEQA”), California Code of Regulations, title 14, § 15000 et seq. (“CEQA Guidelines”), and the Los Angeles CEQA Threshold Guide. We urge Metro to consider the issues identified below and to update the EIR to fully and accurately describe the Project and analyze its impacts.

GO13-1

NRDC has a vested interest in preserving the quality, character, accessibility, and enjoyment for those visiting the Los Angeles State Historic Park given our decades-long advocacy along with many other community allies to protect and create the parkland. Los Angeles State Historic Park was created after a tremendous community campaign to defeat a warehouse development plan that threatened the 32-acre open space. We offer the following comments to ensure Metro adequately considers all the impacts the Project will have on the park and adjacent downtown Los Angeles neighborhoods.

**I. The DEIR’s impact analysis is flawed and should be revised.**

The DEIR appears to employ an overly broad and contradictory analytic approach that may not describe with adequate specificity the full range of significant negative impacts the Project will have on the aesthetic and cultural characteristics of the Project site and surrounding areas. As such, a court might find that the DEIR fails in its basic purpose as a useful, informational document for the public and decision makers.<sup>1</sup>

GO13-2

FN GO13-2<sup>1</sup> *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564.

**A. The DEIR’s aesthetic impacts analysis should be augmented and revised.**

The DEIR presents an insufficient analysis of the aesthetic impacts the Project will have on the immediate surrounding areas, particularly near Los Angeles State Historic Park. The DEIR divides the immediate vicinity of the Project alignment into six different Landscape Units that encompass the location of the Project alignment and adjacent areas beginning in the southern portion of the Project alignment and ending in the north. Of most significance, the DEIR does not sufficiently analyze the aesthetic impacts to Landscape Unit 4, which begins at the southwestern corner of Los Angeles State Historic Park. The LA CEQA Thresholds Guide notes the value of preserving sightlines to designated scenic resources or areas of visual interest from public vantage points. The DEIR acknowledges that the subjects of valued or recognized views may be focal or panoramic, including urban skylines, mountain ranges, or large bodies of water. The DEIR further acknowledges the Project’s interruption to the panoramic skyline views of downtown Los Angeles from Los Angeles State Historic Park.

GO13-3

Los Angeles Historic State Park is a large open space that is in stark contrast to the dramatic skyline of downtown Los Angeles.<sup>2</sup> Sometimes referred to as the “front porch” of Los Angeles, there are no other sites that capture this welcoming view of downtown.<sup>3</sup> Despite acknowledging the aesthetic significance of the downtown Los Angeles urban skyline, the DEIR concludes the Project will have no significant impact for a variety of unpersuasive reasons. For example, the DEIR vaguely relies on a “walkway in the park” as an area that will continue to have uninterrupted views.<sup>4</sup> The DEIR further asserts that there are no significant aesthetic impacts because “existing views of downtown from other areas in the park are already interrupted under existing conditions by trees.”<sup>5</sup> The mere possibility that one may potentially be able to find an area within the park where the view may be seen would not seem to negate the significant negative impact to a designated area of visual interest. CEQA does not require that a view be hindered from every possible vantage point; rather, CEQA demands an inquiry into whether the Project would have potentially significant impacts with respect to views if the Project’s development were to obstruct an existing view of a valued visual resource.<sup>6</sup>

GO13-4

Further, the DEIR purports to describe its consistency with the Los Angeles State Historic Park General Plan. For a project in an urban area, a significant impact to visual character or quality occurs if the project conflicts with applicable zoning regulations or other regulations governing scenic quality. The DEIR appears to contain contradictory statements regarding the Project’s consistency with the Los Angeles State Historic Park General Plan. On the one hand, it states that the proposed Project must obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the park. However, later in the DEIR it states that the proposed Project would be consistent with Los Angeles State Historic Park General Plan

GO13-5

<sup>2</sup> Los Angeles State Historic Park General Plan (2005), <https://lastatehistoricpark.org/wp-content/uploads/2021/07/LASHP-General-Plan.pdf>.

<sup>3</sup> *Id.* at 38.

<sup>4</sup> Draft Environmental Impact Report, Appendix C- Visual Impact Assessment at 74, [https://www.dropbox.com/sh/trfpt09to0kp4a8/AACPE0qySShhT2mqXi172mAha/Documents/Draft%20EIR%2010.17.22/Draft%20EIR%20and%20Appendices?dl=0&preview=Appendix+C\\_VIA.pdf&subfolder\\_nav\\_tracking=1](https://www.dropbox.com/sh/trfpt09to0kp4a8/AACPE0qySShhT2mqXi172mAha/Documents/Draft%20EIR%2010.17.22/Draft%20EIR%20and%20Appendices?dl=0&preview=Appendix+C_VIA.pdf&subfolder_nav_tracking=1).

<sup>5</sup> *Id.*

<sup>6</sup> California Code Regs., title 14, Section 15000 Appendix G.

FN GO13-4

aesthetic resources goals to protect and enhance scenic viewsheds and features. Not only does the DEIR appear to lack any description of the Project’s ability to protect and enhance scenic viewsheds and features, but the document also fails to acknowledge the project’s existing inconsistency with the Los Angeles State Historic Park General Plan, which prohibits the very type of (transit) Project proposed.

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GO13-5

The DEIR also appears to minimize the significant negative visual impacts the Project will have on the surrounding area. For CEQA purposes, visual impacts in urbanized areas are assessed based on changes to views from publicly accessible locations or public views. However, in finding that the Project will have no significant impact, the DEIR states that pedestrians and motorists may have less of a personal investment in the visual appearance of the proposed Project because they are “primarily visiting and do not necessarily reside in the area.” The DEIR relies on residents not being included in viewership, while simultaneously minimizing negative impacts by asserting that public viewers have “fleeting and/or temporary views” since they do not reside in the area. The DEIR posits a circular argument, obviating the possibility that pedestrians and motorists experience significant impacts since CEQA requires the Lead Agency to only consider the views of the public, then relying on the presumption that the public could never experience a significant impact since their views are temporary as non-residents. This type of reasoning would render the viewership analysis requirements of CEQA meaningless.

GO13-6

CEQA requires the data in an EIR to be not only sufficient in quantity but presented in a manner calculated to adequately inform the public and decision makers.<sup>7</sup> Given the inconsistencies throughout the DEIR’s examination of potential aesthetic impacts, we urge Metro to include an accurate and robust analysis of the Project’s aesthetics impacts, particularly as these impacts affect Los Angeles State Historic Park.

GO13-7

**B. The DEIR’s analysis of impacts to cultural resources is flawed and should be revised.**

CEQA and its implementing guidelines require the evaluation of potential impacts to cultural resources.<sup>8</sup> The evaluation of impacts to historical resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to a historically significant resource or resources and, if so; (2) a determination of whether the Project would result in a “substantial adverse change” in the significance of the resources. A “substantial adverse change” in the significance of a historical resource is an alteration that materially impairs the characteristics that convey its historical significance and justify its eligibility for listing.

GO13-8

Under these guidelines, the DEIR does not appear to adequately analyze the Project’s impact on cultural resources. The proposed Project is located within the urbanized and developed City of Los Angeles communities of downtown, El Pueblo, Chinatown, Mission Junction, Solano Canyon, and Elysian Park. These areas are known, in part, for their rich historical and cultural resources including over thirty culturally significant buildings, sites, districts, structures, and

FN GO13-7 <sup>7</sup> Public Resources Code Section 21000 et seq.

FN GO13-8 <sup>8</sup> CEQA Guidelines Section 15064.5.

landscapes within the immediate vicinity of the Project alignment. While the DEIR acknowledges the significant presence of cultural resources the Project may affect, it denies without explanation any significant impacts to the resources.

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GO13-8

The DEIR minimizes the Project’s significant impact to the Los Angeles Union Station Passenger Terminal and Grounds, a cultural resource listed by the federal National Historic Preservation Act of 1966 and the California Register of Historical Resources. Built in 1939, Los Angeles Union Station is an architectural gem, utilizing a unique combination of Spanish Colonial Revival and Art Deco styles. Passengers, commuters, and tourists are welcomed with lush courtyards laden with orange trees, fan palms, and espalier magnolias. The DEIR describes the Project’s proposed Alameda Station as “a concrete structure and platform with a barrel-arched canopy made of custom-perforated metal.” The Project station would be over 75 feet above street grade, with a platform of over 30 feet above street grade. The DEIR further states: “The proposed Alameda Station would become a dominant visual feature of Alameda Street due to its size, design, and location elevated over the street. The proposed Alameda Station would be a highly visible change to the overall setting of the Los Angeles Union Station Passenger Terminal and Grounds property, which is designated for both its architectural and historical significance.” Despite the assertions recognizing the visibly dominating impacts the enormous new proposed Alameda Station will have on the Los Angeles Union Station Passenger Terminal and Grounds, the DEIR inconsistently found the Project to have a less than significant impact.

GO13-9

We look forward to the EIR containing a thorough and accurate analysis of the Project’s impacts not only on Los Angeles Union Station Passenger Terminal and Grounds, but also to the other cultural resources identified throughout the DEIR.

**II. The DEIR’s project description may be incomplete and may not fully analyze reasonably foreseeable activities as required by CEQA.**

CEQA requires that a project be described with enough particularity that its impacts can be assessed.<sup>9</sup> The relevant standard for ascertaining what constellation of activities should be deemed to be a part of the “whole of an action” of a Project is whether such activities comprise “a group of interrelated actions” that are “part of a single, coordinated endeavor.”<sup>10</sup> We are concerned that the DEIR may lack enough information to examine and evaluate the Project fully, effectively analyzing the project in a vacuum rather than including related and necessary operations, and omitting certain of the Project’s foreseeable impacts.

GO13-10

**A. The DEIR may be lacking critically important details in its project description.**

Despite our understanding that documents exist associating the Project with foreseeable commercial and residential growth at the 260-acre McCourt Global property, the DEIR omits any mention of near-future commercial activity or development plans at Dodger Stadium. CEQA prohibits a project proponent from seeking approval of a large project in smaller pieces in order

GO13-11

<sup>9</sup> *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192.

<sup>10</sup> *Association for a Cleaner Environment v. Yosemite Community College Dist.* (2004) 116 Cal.App.4th 629, 636.

to take advantage of environmental exemptions or lesser CEQA review for smaller projects.<sup>11</sup> California courts have repeatedly held that “an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient [CEQA document].”<sup>12</sup> Absent a complete project description, courts view the environmental analysis under CEQA as impermissibly limited, thus minimizing the project’s impacts and undermining meaningful public review.<sup>13</sup>

California courts have articulated “general principles” for determining whether two actions are one CEQA project, including “how closely related the acts are to the overall objective of the project,” and how closely related they are in time, physical location, and the entity undertaking the action.<sup>14</sup> The appropriate inquiry is whether two projects are related to one another, *i.e.* they comprise the “whole of an action” or “coordinated endeavor.”<sup>15</sup>

Courts have found improper piecemealing when the purpose of the reviewed project is to be the first step toward future development.”<sup>16</sup> It is both logical and reasonable to infer that the Project is soon likely to be associated with development activity given the facts surrounding Dodger Stadium and the practical effects of the Project. For example, there are 81 home games in a regular baseball season, with up to 12 post-season games. The City of Los Angeles’s Conditional Use Permit for Dodger Stadium allows a maximum of four special events per month. Even assuming additional special events, the Project is likely to be used at capacity no more than one hundred fifty days of the year. Accordingly, developing the area surrounding the Dodger Stadium Tower for entertainment, retail, and other commercial activities is a reasonable conclusion that could provide a practical basis and explanation for carrying out the Project.

We recommend that the EIR be revised to consider the entirety of the Project, including all reasonably foreseeable phases, consistent with CEQA.

**B. The DEIR should include an analysis of induced growth.**

Section 15125.2(d) of the CEQA Guidelines requires a discussion of the ways in which a project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without the implementation of a proposed project.

When evaluating the potential environmental impact of a project that has growth inducing effects, an agency is not excused from environmental review simply because it is unclear what future developments may take place; it must evaluate and consider the environmental effects of

<sup>11</sup> *Arviv Enterprises, Inc. v. South Valley Area Planning Com.*, (2002) 101 Cal.App.4th 1337, 1340.

<sup>12</sup> *County of Inyo, supra*, 71 Cal.App.3d 185, 193.

<sup>13</sup> *Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376.

<sup>14</sup> *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1226-1227.

<sup>15</sup> *Id.*

<sup>16</sup> *Laurel Heights Improvement Assn., supra*, 47 Cal.3d 376; *Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263; *City of Antioch v. City Council* (1986) 187 Cal.App.3d 1325.

cont'd  
GO13-11

GO13-12

the “most probable development patterns.”<sup>17</sup> In fact, even if there is uncertainty as to the precise form of development that would eventually occur, a Project is not insulated from CEQA.<sup>18</sup>

cont'd  
GO13-12

It is not our position that the DEIR must analyze with significant detail every conceivable development scenario; however, the DEIR needs to analyze the impacts in relation to the most probable development patterns. Publicly available resources have revealed the possibility of future development at the site of the Project. For example, information from the Los Angeles County Recorder’s Office details possible future developments at Dodger Stadium that “may include, but are not limited to (i) office buildings, (ii) hotel and exhibition facilities, (iii) residential buildings, (iv) medical buildings, (v) academic buildings, (vi) parking structures, and/or (vii) retail, dining, and entertainment facilities.”<sup>19</sup> Further, the company that owns fifty percent of the parking lot at Dodger Stadium publicized its ownership interest in the 260-acre Dodger Stadium land as a “current real estate project.”<sup>20</sup> Even without the aforementioned documents evidencing potential development at Dodger Stadium, the DEIR should account for the foreseeable and probable growth inducing development impacts of the Project.

GO13-13

The EIR should examine ways in which the proposed Project could foster economic growth, either directly or indirectly, in the surrounding environment.

### III. Conclusion

We have concerns as to whether the DEIR is adequately disclosing, analyzing, and mitigating the Project’s environmental impacts. CEQA requires that Metro’s review adequately identify and analyze the Project’s foreseeable direct, indirect, and cumulative impacts. Thank you for your consideration in this matter. We look forward to reviewing your responses to our comments.

GO13-14

Respectfully submitted,

Paulina Torres  
Staff Attorney  
Natural Resources Defense Council

Damon Nagami  
Senior Attorney  
Natural Resources Defense Council

<sup>17</sup> *Aptos Council v. Cnty. of Santa Cruz* (2017) 10 Cal.App.5th 266.

<sup>18</sup> *Antioch*, supra, 137 Cal.App.3d 1325, 1337.

<sup>19</sup> “Declaration of Covenants, Conditions, Restrictions, and Easements of Chavez Ravine,” Section 14.3, Los Angeles County Recorder’s Office, Document #20120642991.

<sup>20</sup> “Our Company,” McCourt Global, <http://web.archive.org/web/20210724150915/https://www.mccourt.com/mccourt-global-overview>. Accessed via The Wayback Machine.

FN GO13-12

FN GO13-13

**From:** John Given <john@johngivenlaw.com>

**Sent:** 1/17/2023 6:03:39 AM

**To:** LAART@metro.net

**Subject:** COMMENT LETTER - Los Angeles Aerial Rapid Transit Project SCH 2020100007

Dear Mr. Zelmer -

Attached please find a comment letter submitted on behalf of LA Parks Alliance and its members with respect to the so-called LA-ART project, State Clearinghouse no. SCH 2020100007. Please confirm receipt of this email and comment letter at your earliest convenience and ensure that my office is on all notification lists for the project.

Thank you for your consideration of the attached comments.

Sincerely,

John Given

--

John Given  
Law Office of John P. Given  
2309 Santa Monica Boulevard, #438  
Santa Monica, CA 90404  
(310)471-8485

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This message and any attachments contain information which may be confidential and privileged. Unless you are the addressee (or authorized to receive for the addressee), you may not use, copy or disclose the message or any information contained in the message. If you have received the message in error, please advise the sender by reply e-mail and delete any version, response or reference to it. Thank you.

LAW OFFICE OF JOHN P. GIVEN  
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January 16, 2023

**Via email to LAART@metro.net and hand-delivery**

Corey Zelmer  
Deputy Executive Officer  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Mail Stop 99-22-6  
Los Angeles, CA 90012

RE: Los Angeles Aerial Rapid Transit Project  
SCH 2020100007

Dear Mr. Zelmer:

This letter is submitted on behalf of LA Parks Alliance<sup>1</sup> with respect to the above-captioned Los Angeles Aerial Rapid Transit Project (the “Project”) in response to the release of the Project’s Draft Environmental Impact Report (“Draft EIR” or “DEIR”).

GO14-1

As an initial matter, please provide me with notice of all hearings, votes, or determinations related to the proposed Project, including timely provision of notices required pursuant to Public Resources Code 21167(f). Note that LA Parks Alliance adopts and incorporates by reference all DEIR comments and objections raised by others during the environmental review process. (See Pub. Res. Code, § 21177.)

GO14-2  
GO14-3

As explained below in detail, the Draft EIR is deficient in many respects. It is incomplete, inaccurate, misleading, and largely supported by assumptions rather than substantial evidence. Among its more serious deficiencies, some of them fatal to its use as the proposed Project’s environmental document, the DEIR misidentifies Metro as the Lead Agency, misidentifies the Project as public transportation, misidentifies the Project as eligible for SB 44, fails to identify and seek review by all required responsible and trustee agencies, assumes the Project may use state parkland for a significant part of its proposed alignment, and engages in piecemealing by ignoring reasonably foreseeable indirect physical changes in the environment due to the Project. In addition, evidence exists that an endangered species may be adversely affected, and Project approval would raise considerable concerns regarding gentrification and environmental justice.

GO14-4

At the very least, the DEIR must be revised and recirculated after its many deficiencies have been corrected. In the alternative, Metro should seriously consider terminating review of the Project at the outset since it plainly cannot be constructed as currently proposed.

GO14-5

FN GO14-1 <sup>1</sup> LA Parks Alliance was formed in 2019 as a response to land use threats to LA State Historic Park. Its members are park and public space advocates. See <https://www.laparksalliance.org>.



## I. GENERAL COMMENTS

### A. Arts District Community Council LA Letter of February 26, 2021

Following close of the Notice of Preparation / Project Scoping for the Project, on February 26, 2021, my office submitted a letter on behalf of Arts District Community Council LA (“ADCCLA”) objecting to Metro’s inadequate Notice of Preparation (“NOP”) issued on or about October 1, 2020. LA Parks Alliance adopts the letter as reflecting its own position on the inadequate NOP, and requests that the DEIR respond to the allegations in that letter as if fully set forth herein.<sup>2</sup> The following summarizes the February 26, 2021, letter comments and objections.

GO14-6

The October 1, 2020, Notice of Preparation for the Project is legally inadequate. The appropriate remedy is a revised Notice of Preparation and recirculation with a new review and comment period for responsive and trustee agencies and members of the public. Title 14 of the California Code of Regulations (hereafter “CEQA Guidelines”) requires that an NOP “shall provide the responsible and trustee agencies, the Office of Planning and Research and county clerk with *sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response.*” (CEQA Guidelines, § 15082(a)(1) (emphasis added).)

The October 1, 2020, NOP is inadequate because it fails to provide sufficient information about the probable environmental effects of the project for responsible agencies to meaningfully respond, and indeed misleads these agencies through use of vague and otherwise inaccurate descriptions of the project. For example, the NOP suggests that there may be no direct impact on LA State Historic Park by describing a *direct flyover* of the park by the preferred project alternatives as being “in connection with providing additional transit service *adjacent to* the Los Angeles State Historic Park.” (NOP, p. 2.) A reasonable interpretation by an uninformed reader of the NOP text could include that if an adjacent station is not constructed that the aerial tram would *not* fly directly over the park. As the February 2021 letter notes, even if the proposed Project did not encroach *on and over* LA State Historic Park, its development adjacent to the park would still have significant adverse impacts on the Park.

GO14-7

The NOP is also inadequate in that it fails to include a summary of the “[p]robable environmental effects of the project.” (CEQA Guidelines, § 15082(a)(1)(C).) Instead, it lists the entirety of the CEQA Guidelines Appendix G analysis categories, explaining that the Draft EIR to follow will address all of them. While that may be factually accurate, the mere listing of analysis categories to be included in a later environmental review document cannot be understood as a description of “probable environmental effects,” and does not serve to provide responsible agencies with sufficient information to make a meaningful response with respect to the scope of environmental review required. If only generalized information is provided to responsible agencies, only generalized responses will be received from them, which is

GO14-8

<sup>2</sup> The February 26, 2021, letter is attached as **Exhibit A**. Note that while it was submitted following the close of the formal scoping process, Metro was required to consider the comments in preparation for the Draft EIR and it is already part of the administrative record of the case. (Pub. Res. Code, § 21082.1(b).)

insufficient to fulfill those agencies' mandatory NOP response obligations. (See CEQA Guidelines, § 15082(b)(3): "A generalized list of concerns not related to the specific project shall not meet the requirements of this section.")

cont'd  
GO14-8

Under CEQA, a "project" is "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." (CEQA Guidelines, § 15378(a) (emphasis added)). Where multiple "activities are part of a coordinated endeavor, among the various steps which taken together obtain an objective, or otherwise related to each other, they constitute a single project for purposes of CEQA." (*County of Ventura v. City of Moorpark* (2018) 24 Cal.App.5th 377, 385 [internal quotation marks and citations omitted].) "CEQA 'cannot be avoided by chopping up proposed projects into bite-size pieces' which, when taken individually, may have no significant adverse effect on the environment. [Citations.]" (*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1223.) This improper practice is commonly referred to as "piecemealing."

GO14-9

The NOP is therefore also inadequate for its incomplete and misleading project description, which must include the readily foreseeable future development at the Dodger Stadium terminus of the Project, where development of some portion of the 260 acres around Dodger Stadium owned or controlled in part by McCourt Global (also owner of the gondola development company ARTT LLC) is plainly foreseeable. McCourt Global's website included the following statements (published even after the NOP was released):

- "Our current real estate projects include...260 acres of land at Chavez Ravine in Los Angeles."
- "McCourt currently owns 260 acres of land at Chavez Ravine in Los Angeles, the home of Dodgers Stadium. Among other plans for the area, McCourt will develop a cutting-edge aerial tramway from Los Angeles Union Station to Dodgers Stadium through its company, Aerial Rapid Transit Technologies."<sup>3</sup>

GO14-10

The failure to include any information in the NOP about this clearly foreseeable development associated with the proposed Project precluded responsible agencies and members of the public from providing meaningful responses on the "whole of the project." This comment is expanded upon at length below, as the Draft EIR suffers from the same fatal flaw.

GO14-11

<sup>3</sup> McCourt Global, *McCourt / Our Company*, last viewed / downloaded May 18, 2021, attached as part of **Exhibit B** (emphasis added); and McCourt Global, *Real Estate Overview*, Nov. 26, 2020, last viewed / screen captured Jan. 12, 2022 via "Internet Archive Wayback Machine" (<https://web.archive.org>), attached as part of **Exhibit B** (emphasis added), available at: <https://web.archive.org/web/20201126121740/https://www.mccourt.com/real-estate-overview>.

FN GO14-10

*But see* McCourt Global, *McCourt Partners Real Estate*, attached as **Exhibit C**, available at: <https://www.mccourt.com/real-estate>, last viewed / screen captured Jan. 12, 2022 (scrubbing references to "real estate projects" and "other plans for the area" around Dodger Stadium except the LA ART project. See also lengthy discussion re Dodger Stadium "piecemealing," *infra* pp. 26-33.

The February 2021 letter also criticizes the description of project alternatives, which then included only the so-called Spring Street alternative, the Broadway alternative, and the no-project alternative. The letter concludes by noting that the inadequate NOP frustrated members of the public, including members of ADCCLA. Its inadequacies interfered with their ability to provide informed comment to the lead agency, and ADCCLA requested that a revised, legally sufficient NOP be recirculated and a new comment period provided.

GO14-12

Subsequently, ADCCLA, through LA Parks Alliance’s letter of December 19, 2022, asserts that Metro was improperly designated as the lead agency under CEQA, and no longer requests that Metro revise and recirculate a legally adequate NOP. Instead, because Metro cannot be designated as the lead agency pursuant to CEQA Guidelines section 15051, both ADCCLA and LA Parks Alliance request that Metro refrain from further environmental review of the Project and instead allow the properly designated CEQA lead agency, the City of Los Angeles, to begin the environmental process anew.<sup>4</sup>

GO14-13

**B. Metro Ignored Mandatory Project Review by Responsible and/or Trustee Agencies.**

The “State Clearinghouse” is responsible for managing CEQA review for state agencies. (CEQA Guidelines, § 15205.) The lead agency has a mandatory duty to provide sufficient copies of an EIR to the State Clearinghouse so it may distribute them for agency review and comment for all agencies that are either “a responsible agency, trustee agency, or otherwise [have] jurisdiction by law with respect to the project” or when the project is identified “as being of statewide, regional, or areawide significance.” (*Ibid.*, subd. (b)(2)-(3).)

GO14-14

The Project fits both requirements. Review is required by many state agencies, including several trustee agencies. The Project is also one of “statewide, regional, or areawide significance” under CEQA Guidelines section 15206 as the Project is within and would substantially impact the Santa Monica Mountains Zone as defined in the Public Resources Code, which includes virtually the *entire* Project area. (See CEQA Guidelines, § 15206, subd. (b)(4).) Public Resources Code section 33105 states, in relevant part (emphasis added):

*The [Santa Monica Mountains Zone] shall also include Elysian Park and El Pueblo de Los Angeles State Historic Park and, for purposes of providing a recreational trail corridor, it shall also include hiking and equestrian trail connections and accessways between Griffith Park, Elysian Park, and El Pueblo de Los Angeles State Historic Park.*

GO14-15

The entire Santa Monica Mountains Zone also falls within the state-designated Rim of the Valley Trail Corridor, for which a Master Plan was adopted in June 1990. (See Pub. Res. Code, §§ 33105.5, 33204.3 et seq.) The Rim of the Valley Corridor, including the entirety of the

FN GO14-13

<sup>4</sup> See John P. Given, letter to Metro Deputy Executive Officer Corey Zelmer (“Objection to Metro as Lead Agency”), Dec. 19, 2022, already a part of the Project record as a comment to the DEIR, and available at <https://www.laparksalliance.org/2022/12/21/objection-to-metro-as-lead-agency/>.

Santa Monica Mountains Zone, has been proposed to be added as a boundary adjustment to an expansion of the National Park Service’s Santa Monica Mountains Recreation Area.<sup>5</sup>

cont'd  
GO14-15

Among the documents provided to the public by Metro when it released the Project’s Draft EIR are a “Notice of Completion & Environmental Document Transmittal” and “Summary Form for Electronic Document Submittal.”<sup>6</sup> The Notice of Completion lists a “Reviewing Agencies Checklist” to allow the lead agency to request the State Clearinghouse to distribute the Notice and Draft EIR documents to reviewing agencies so that those agencies can fulfill their CEQA comment obligations. (Notice of Completion, p. 2.) The Summary Form similarly allows the lead agency to provide a list of responsible or trustee agencies to the State Clearinghouse. (Summary Form, p. 2.)

Metro failed to include at least two state agencies that should have received notice and copies of the Draft EIR on the Notice of Completion form as required. The first, the Santa Monica Mountains Conservancy (“SMMC”), is a designated trustee agency over resources within the Project area. (See Pub. Res. Code, § 33105, quoted above.)<sup>7</sup> It was not listed on either State Clearinghouse Form.<sup>8</sup>

GO14-16

The second state agency Metro failed to notify, the California Department of Housing and Community Development (“HCD”), has responsibilities which include ensuring every California city (whether a general law or charter city) assesses, analyses, and plans for “an

<sup>5</sup> See **Exhibit D**, which includes: Santa Monica Mountains Conservancy (SMMC), Rim of the Valley Trail Corridor Boundary map and excerpts from Rim of the Valley Trail Corridor Master Plan; National Park Service, Rim of the Valley Unit Proposed Addition to Santa Monica Mountains National Recreation Area. SMMC’s entire ROV Master Plan is available at: [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwi1\\_YmO88z8AhWjKkQIHUZLCPEQFnoECAyQAQ&url=https%3A%2F%2Fsmmc.ca.gov%2Fwp-content%2Fuploads%2F2020%2F04%2FROV-Master-Plan.pdf&usq=AOvVaw0pYr2L5XdpzX\\_kj982-GC6](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwi1_YmO88z8AhWjKkQIHUZLCPEQFnoECAyQAQ&url=https%3A%2F%2Fsmmc.ca.gov%2Fwp-content%2Fuploads%2F2020%2F04%2FROV-Master-Plan.pdf&usq=AOvVaw0pYr2L5XdpzX_kj982-GC6) .)

FN GO14-15

<sup>6</sup> As of December 21, 2022 the documents seem to no longer be available at Metro’s web page for the Project (<https://www.metro.net/projects/aerial-rapid-transit/>) or in the related Dropbox file link found on that page for the DEIR and other documents. They should be a part of the Project record, but are attached as part of **Exhibit E**.

<sup>7</sup> See also, Supervising Deputy Attorney General Christina Bull Arndt, letter to Executive Director Joseph T. Edmiston, Santa Monica Mountains Conservancy, July 26, 2021, attached as **Exhibit F**. “The Conservancy meets the definition of a trustee agency because it is a state agency which has jurisdiction over the natural resources of the [Santa Monica Mountains] Zone, which it holds in trust for the people of California...[T]he Conservancy should be considered a trustee agency for any CEQA project which affects natural resources within the Zone.” (Exhibit F, p. 3.)

FN GO14-16

<sup>8</sup> Curiously, the Notice of Completion lists a similar agency, the “California Baldwin Hills Conservancy (BHC),” as a reviewing agency for the Project even though at closest Baldwin Hills is approximately seven miles distant from, and has no resources near or within, the Project area. For more information, see <http://bhc.ca.gov>.

inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality’s housing need” for various income levels. (Cal. Gov. Code, § 65583, subd. (a)(3).) It was likewise not listed on either State Clearinghouse Form.

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GO14-16

The Surplus Lands Act (Govt. Code sections 54220-54234) provides for a right of first refusal to other public agencies whenever a local agency proposes to dispose of surplus land. A notice of availability requirement is applicable to both the SMMC and the HCD. (Govt. Code, §§ 54222, 54230.5.) Sales and leases of surplus lands generally qualify as dispositions requiring approval of HCD before sale or lease of surplus land can be finalized. (Govt. Code, § 54230.5, subd. (b)(1).)<sup>9</sup> Similarly, California law requires that the sale of *any property* by a public agency within the Santa Monica Mountains Zone requires offering the land to the SMMC first:

The conservancy shall have the first right of refusal on any property within the zone presently owned by a public agency and scheduled for disposal as excess lands, except where such lands are designated for acquisition as a park or recreation area by a federal, state, or local agency. The conservancy shall have the right to acquire such lands at the disposing agency’s purchase price plus any administrative and management costs incurred by the disposing agency. (Pub. Res. Code, § 33207(b).)

GO14-17

The DEIR describes public lands within the City of Los Angeles as potential sites for several Project components. For example, “the proposed Alameda Tower, which would be constructed on the Alameda Triangle, a portion of City ROW between Alameda Street, North Main Street, and Alhambra Street.” (DEIR, p. ES-4.) “The proposed Alpine Tower would be constructed at the corner of Alameda Street and Alpine Street on city-owned property.” (*Ibid.*) “[T]he proposed Chinatown/State Park Station would be constructed partially on City ROW and partially within the boundaries of the Los Angeles State Historic Park.” (*Ibid.*)

The City of Los Angeles maintains and periodically publishes a list of declared and undeclared surplus properties that can be reviewed by registering for and then downloading them from the Department of General Services website.<sup>10</sup> Review of recently downloaded declared and undeclared surplus properties lists discloses that none of the site described in the DEIR were listed as either declared or undeclared surplus properties when the DEIR was released.<sup>11</sup>

Before the City of Los Angeles may dispose of any of the lands described in the DEIR as city-owned, under the Surplus Lands Act it must notify both SMMC and HCD that the lands are

FN GO14-16

<sup>9</sup> See also, HCD’s Surplus Lands Act FAQ, available at: <https://www.hcd.ca.gov/docs/planning-and-community-development/slafaq.pdf>.

FN GO14-17

<sup>10</sup> See <https://gsd.lacity.org/services/integrated-asset-services/property> .

<sup>11</sup> See “City of Los Angeles – Surplus Declared Properties as of (12/6/2022)” and “City of Los Angeles – Surplus Undeclared Properties as of (12/6/2022)” downloaded from the General Services website on December 20, 2022, attached as **Exhibit G**.

surplus and follow the appropriate legal process before it may dispose of them for the benefit of a private project, including the LA-ART gondola Project. But Metro’s State Clearinghouse submissions failed to identify SMMC and HCD as responsible agencies and failed to identify SMMC as a trustee agency. There is no indication that either agency has had any notice of the Project, let alone adequate notice.

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GO14-17

LA Parks Alliance notes that it is highly unlikely that the proposed site for the Alpine Tower Project component, described as “currently being used as non-public parking storage for City vehicles” (DEIR, p. ES-8), would be available to the proposed Project given its highly suitable location for affordable housing. Affordable housing is particularly appropriate at sites near public transit. The parcel at the proposed Alpine Tower location is approximately 700 feet from Metro’s Gold Line Chinatown station, less than half a mile from LA Union Station, and located between and at most only a few hundred feet from existing major bus route stops along Alameda Street. (See DEIR, Table 3.17-1 and Figure 3.17-2, pp. 3.17-13 to 3.17-16.)<sup>12</sup> If desired, bus stops could be added or re-located nearer to the parcel to be even more convenient for a future affordable housing project at the site.

There are numerous state incentives for housing opportunities near public transit. California’s Density Bonus Law, for example, allows affordable housing projects to reduce or eliminate parking, providing a major cost benefit for affordable projects. (See generally, Govt. Code, §§ 65915-65918). HCD has an Affordable Housing and Sustainable Communities Program, which “funds land-use, housing, transportation, and land preservation projects to support infill and compact development that reduce greenhouse gas (“GHG”) emissions.”<sup>13</sup> The City of Los Angeles has its own Transit Oriented Communities Affordable Housing Incentive Program and Guidelines which in some respects exceeds the baseline requirements of the State Density Bonus Law. (See Los Angeles Municipal Code (“LAMC”), § 12.22 A.31.)

GO14-18

For the preferred alternative of the Project to proceed, it would almost certainly have to undergo a major design overhaul to relocate the Alpine Tower, as there is very little chance a tower could be constructed at the desired site given the site’s suitability for a far more urgent need with legally superior right to the site than a private gondola project. Moreover, the environmentally superior alternative, the Transportation Systems Management Alternative, remains available, and with only modest modifications could easily achieve most Project goals, leaving the proposed Alpine Tower site for its more suitable use as affordable housing.

Metro’s failure to provide notice to SMMC and HCD requires, at the least, an immediate extension of the comment period so that these agencies have sufficient time to study the Draft EIR with respect to Project concerns related to their respective jurisdictions. The DEIR is inadequate for its failure to identify the clearance required by HCD before any of the City public land identified by the DEIR may be transferred to a private party to construct or operate the

GO14-19

<sup>12</sup> As the County’s regional transportation authority, Metro is particularly well suited to analyze the suitability of the site for affordable housing with respect to proximity of existing public transit options.

<sup>13</sup> For more information, see <https://www.hcd.ca.gov/grants-and-funding/programs-active/affordable-housing-and-sustainable-communities>.

Project. It is further inadequate for failing to identify the potentially significant land use conflicts under the Surplus Lands Act and Public Resources Code related to the public interest and resources identified in those statutes. The environmental review process cannot proceed until this serious procedural error has been fully remedied.

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GO14-19

### C. The Project is Not a Public Transit Project Eligible for SB 44 Streamlining

As discussed briefly in an earlier DEIR comment letter, the Project is *not* a public transit project, as it is proposed to be privately owned and operated and intended primarily to provide service to and from Dodger Stadium, a private sports and event venue.<sup>14</sup> It is therefore not eligible for SB 44 streamlining as an environmental leadership transit project (“ELTP”) as claimed in the DEIR. (DEIR, pp. 1-4 to 1-9.) The Draft EIR is therefore inaccurate and misleading and fails as an informational document for including these false claims. Moreover, since the Project is not eligible for SB 44, any attempt by Metro to limit the exercise of project objectors’ rights under generally applicable law that does apply would violate CEQA’s strict procedural mandates and likewise allow for objectors to seek an appropriate legal remedy.

GO14-20

The mandatory requirements for SB 44 are found in Public Resources Code section 21168.6.9. An ELTP is a “project to construct a fixed guideway and related fixed facilities that meets *all*” of the conditions of subdivision (a)(1) of that statute. The first requirement is the project be a “fixed guideway operating at zero emissions.” The ELTP statute uses the federal definition for “fixed guideway” found in Chapter 53 (Public Transportation) of the United States Code. (Pub. Res. Code, § 21168.6.9, subd. (a)(2), citing 49 U.S.C. § 5302.)

Under federal law, a “fixed guideway” is precisely defined as follows:

Fixed guideway.—The term “fixed guideway” means a public transportation facility—

- (A) using and occupying a separate right-of-way for the exclusive use of public transportation;
  - (B) using rail;
  - (C) using a fixed catenary system;
  - (D) for a passenger ferry system; or
  - (E) for a bus rapid transit system.
- (49 U.S.C. § 5302, subd. (8).)

GO14-21

The term “public transportation” used in the definition for “fixed guideway” is further defined as follows. “Public transportation:”

- (A) means regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low income; and
- (B) does not include—

FN GO14-20<sup>14</sup> See Given letter, pp. 8-10, *supra* p. 4 fn. 4.

- (i) intercity passenger rail transportation provided by the entity described in chapter 243 (or a successor to such entity);
  - (ii) intercity bus service;
  - (iii) charter bus service;
  - (iv) school bus service;
  - (v) sightseeing service;
  - (vi) courtesy shuttle service for patrons of one or more specific establishments; or
  - (vii) intra-terminal or intra-facility shuttle services.
- (49 U.S.C. § 5302, subd. (15).)

cont'd  
GO14-21

The proposed Project is not “public transportation” within the meaning of federal law.

First, the Project is not a “regular, continuing shared-ride surface transportation” service. It is not “regular” and “continuing.” The Project is intended primarily to provide “a direct transit connection between LAUS and the Dodger Stadium property...” (DEIR, p. 2-12.) On non-game and non-event days, the Project would operate at the discretion of the operator, not on a regular schedule: “It is anticipated that the proposed Project operations would vary the number of cabins in service and speed throughout the day, *based on demand.*” (DEIR, p. 2-42 (emphasis added).) Compare this demand-based operational decision-making to the continuing and regular Gold Line and local bus route schedules, which operate each day on a published schedule without respect to day-to-day demand.

Moreover, the Project’s proposed use for other purposes, including travel to and from Dodger Stadium for use by community members in neighborhoods near Dodger Stadium are entirely speculative. See DEIR, p. ES-10: “The Project Sponsor *will request consideration* by the Los Angeles Dodgers *of the potential* for the Dodger Stadium Station to include a mobility hub where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon.”

GO14-22

The decision to operate based on commercial demand rather than on a regular schedule, and speculative permissive use by a separate entity to allow operation on some days but not others mean the Project is not “regular” and “continuing” and therefore is not “public transportation” under applicable federal law.

Second, the Project would not provide *surface* transportation at all, as it is an *aerial* tramway. It is designed and intended to carry its passengers *above* surface transportation, to entirely avoid vehicle traffic. Consideration of the project types that may be considered a “fixed guideway” is informative. (See 49 U.S.C. § 5302, subd. (8), which lists only rail, fixed catenary systems, passenger ferry systems, and bus rapid transit systems.) None are or include aerial, non-surface transportation, such as a gondola or aerial tram.

GO14-23

Third, on game and event days at Dodger Stadium, the Project would not be “open to the general public or open to a segment of the general public defined by age, disability, or low

GO14-24



income.” The Project would prioritize Dodger ticket holder (and presumably special event use) (DEIR, p. 3.17-25) and may entirely exclude the “general public” at those times. Such limitations show the Project is not “public transportation” as defined in section 5302 subdivision (A). In fact, such limitations cause the Project to be more accurately described as a “courtesy shuttle service for patrons of one or more specific establishments,” which is specifically excluded from being considered “public transportation” under section 5302 subdivision (B).

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GO14-24

The DEIR also describes the Project’s use for tourism. “Tourism ridership would be driven by the proposed Project capturing a share of the existing tourism market in Los Angeles, particularly for tourists to downtown Los Angeles visiting other attractions.” (DEIR, p. 3.17-25.) But “sightseeing” services for tourism are also specifically excluded from consideration as “public transportation” under relevant federal law. (49 U.S.C. § 5302, subd. (15)(B)(v).)

GO14-25

The Project is not “public transportation.”

Since the first requirement of a “fixed guideway” is that it be a “public transportation facility” the Project cannot be considered a “fixed guideway” and on that basis does not qualify for SB 44 ELTP streamlining. But even assuming the Project could be considered “public transportation,” which plainly based on a textual analysis of the federal statute it cannot be, other section 5302 requirements are also not met.

Notwithstanding the DEIR’s contrary conclusion, the project would *not* “us[e] and occupy[] a separate right-of-way for the exclusive use of public transportation.” The DEIR claims, “the proposed Project would exclusively use and occupy the airspace above the public right-of-way through a franchise agreement with the City of Los Angeles” and “[f]or that reason, the proposed Project, as a type of aerial tramway, is properly classified as a “fixed guideway” as defined by SB 44.” (DEIR, p. 1-5) This analysis is incomplete, inaccurate, and misleading.

GO14-26

The Project’s *surface* components would be built primarily (but not exclusively) within an existing City right-of-way that is used primarily by surface vehicles (DEIR, p. ES-4). Only the *aerial* components of the Project would be constructed and operated above that right of way, but they would also not operate exclusively in that area. The Project would use other areas in addition to the City’s right of way areas for its operation. It would also use airspace above private properties, above Los Angeles State Historic Park, above Metro’s Gold Line, and above the SR-110 freeway. (ES-4 to ES-7.) It’s queuing areas could also be expected to use surface area space dedicated to other purposes. (See, e.g., ES-8, describing queuing areas located “in a proposed new pedestrian plaza at El Pueblo...”)

And the Project proposes to use significant surface area of the Los Angeles State Historic Park. (DEIR, p. 3.11-38: “The Chinatown/State Park Station would have a footprint of 2,195 square feet in the park, and the station canopy would have an overhang of 9,320 square feet over the park.”) It is evident from information included in the DEIR that the Project would *not* use and occupy a separate right-of-way for the exclusive use of public transportation, since it would also use spaces within several parks and other public and private spaces that are *not* reserved for the exclusive use of public transportation. Even the surface area of City rights-of-way where

GO14-27

Project components would be built (and over which they would “overhang,” as the DEIR describes it, see, e.g., DEIR, pp. 2-51 to 52), are not exclusively used for public transportation, as they are roadways open for ordinary vehicle traffic.

GO14-27

The DEIR fails to provide a meaningful SB 44 analysis including the Project’s anticipated use of the described ground and airspaces that are proposed to be used by the Project that are not reserved for the exclusive use of public transportation. The DEIR’s conclusory statement about only one part of the Project that uses an *aerial* portion of the City right-of-way is in no way adequate to show it meets all of section 5302’s requirements.

GO14-28

To complete the analysis under section 5302, the Project is not a “rail” project. It does not use a “fixed catenary system.”<sup>15</sup> It is not for a “passenger ferry system” or a “bus rapid transit system.” (49 U.S.C. § 5302, subs. (8)(B)-(E).)

GO14-29

As the Project does not meet *any* of the basic requirements of relevant federal law to be considered a “fixed guideway facility” it is clearly not eligible for SB 44 streamlining status. This is, without more, sufficient to show that the Project is not eligible as an environmental leadership transit project under SB 44.<sup>16</sup> But the requirement to be a “fixed guideway facility” is but *one* of SB 44’s requirements. Among other things, the DEIR must *also* demonstrate that the Project “reduces emissions by no less than 50,000 metric tons of greenhouse gases directly in the corridor of the project defined in the applicable environmental document over the useful life of the project, without using offsets,” “reduces no less than 30,000,000 vehicle miles traveled in the corridor of the project defined in the applicable environmental document over the useful life of the project,” *and* that it is consistent with applicable planning and transportation strategies. (Pub. Res. Code, § 21168.6.9, subs. (1)(B)-(E).) The DEIR analysis of these additional requirements is likewise inadequate, inaccurate, and incomplete for the DEIR’s failure to consider and analyze the readily foreseeable future development at the Dodger Stadium terminus of the Project, a significant and fatal flaw which will be discussed further below.<sup>17</sup> Dodger Stadium development would draw passenger vehicles to the Project area that are not considered in any DEIR analysis category, and invalidate all conclusions with respect to reduction of greenhouse gas emissions, vehicle miles traveled, and consistency with applicable planning and transportation strategies.

GO14-30

“Full compliance with the letter of CEQA is essential to the maintenance of its important public purpose. Reviewing courts have a duty to consider the legal sufficiency of the steps taken by [administrative] agencies [citation], and *we must be satisfied that these agencies have fully*

GO14-31

FN GO14-29

<sup>15</sup> “[A] catenary is a system of overhead wires used to supply electricity to a locomotive, streetcar, or light rail vehicle which is equipped with a pantograph. The pantograph [sic] presses against the underside of the lowest overhead wire, the contact wire.” Southeastern Pennsylvania Transportation Authority (SEPTA), *What is a Catenary?*, July 13, 2017, <https://iseptaphilly.com/blog/catenary>. The Metro Gold Line is such a system. (DEIR, p. 5-61.)

FN GO14-30

<sup>16</sup> Notably, and as discussed in LA Parks Alliance’s earlier letter, ARTT LLC has even argued that its Project is not a “transit guideway system.” See Given letter, *supra* note 4, p. 8, fn. 9.

<sup>17</sup> See also, comments re NOP, *supra* pp. 2-4.

*complied with the procedural requirements of CEQA, since only in this way can the important public purposes of CEQA be protected from subversion.” (Envtl. Prot. Info. Ctr. v. Johnson (1985) 170 Cal.App.3d 604, 622-623 (citations and internal quotation marks removed, emphasis added).) The Project is not eligible for SB 44 as an environmental leadership transit project. The environmental review process must therefore follow CEQA’s generally applicable procedural mandates.*

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GO14-31

**D. No Part of Los Angeles State Historic Park is Available for Sale or Lease for Commercial Purposes; Proposed Entitlements from California Department of Parks and Recreations to Allow Use of the Park Cannot be Granted.**

**1. Proposed Use of Los Angeles State Historic Park.**

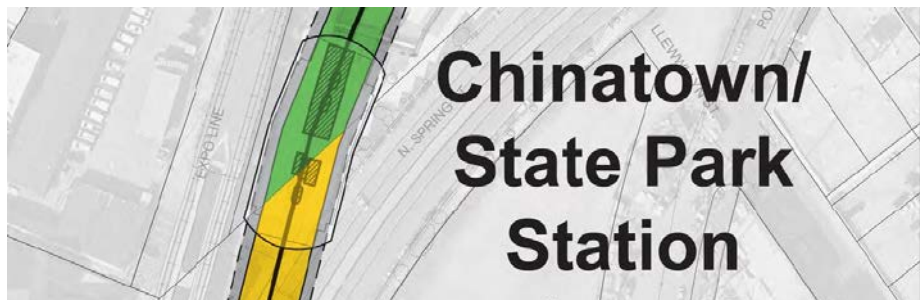
The preferred Project alignment proposes the use of land and airspace at and above Los Angeles State Historic Park (“LASHP”). (DEIR, p. ES-4.) The DEIR describes the Project’s Chinatown/State Park Station as “constructed partially on City ROW and partially within the boundaries of” LASHP, suggesting that the station is evenly shared between City land and the park. (*Ibid.*) The more accurate description for those who venture beyond the DEIR’s executive summary, discloses that the station uses far more parkland than City ROW:

The station would have a footprint of 2,605 square feet, comprised of 410 square feet located on City ROW and 2,195 square feet in the park. The station canopy would have an overhang of 15,030 square feet, comprised of 5,710 square feet over City ROW and 9,320 square feet over the park.

GO14-32

(DEIR, p. 2-52.)

More than 84 percent of the station’s footprint is located within the LASHP boundary, and approximately 62 percent of the station’s “overhang” is located above the park. The following image, taken from DEIR Appendix Q, p. 4, shows how the Project footprint and “overhang” of the Chinatown/State Park Station are predominantly within LASHP.



In addition, the DEIR states that “[t]he proposed Project’s required aerial clearance width over the Los Angeles State Historic Park would be 53 feet 2 inches wide with an area of approximately 59,470 square feet, *plus an Additional Separation Buffer.*” (DEIR, p. 2-52 (emphasis added).) While the “Additional Separation Buffer” is mentioned within the DEIR

GO14-33

numerous times (e.g., *ibid.*), nowhere is it specifically defined. The discussion of American National Standards Institute (ANSI) Standard B77.1 (DEIR, pp. 2-18 to 2-19), clearly states that the 53 feet 2-inch width does *not* include the Additional Separation Buffer. Overhead images in the DEIR that show the Additional Separation Buffer likewise do not provide meaningful information about the area the buffer would occupy. (See, e.g., DEIR, Figure 2-7, p. 2-20; DEIR Appx. Q, p. 4.) The DEIR thus fails to provide the necessary information necessary to understand how much park area would be used by the Project.

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GO14-33

The above measurements describe an *area* for the Project alignment, which is perhaps helpful to understand the Project when viewing it on an overhead plan view. But the Project is not flat. It will exist and operate within a 3-dimensional envelope. The DEIR fails to explain the total *volume* of space required by the Project to operate safely within LASHP, only noting that “[t]he aerial clearance would allow the continued use of the park, with certain limitations.” (DEIR, p. 2-52.) The DEIR fails not only to provide the necessary information to understand the volume of space used by the Project, but also to explain the specific limitations that might be imposed upon LASHP visitors as they use the park as a result of construction of the Project.

GO14-34

The DEIR does explain that certain activities, such as kite flying, would not be possible in the vicinity of the Project, and that LASHP special event spaces would need to be altered to some degree from where they might otherwise be located to accommodate the Project. (DEIR, pp. 5-60 to 5-63.) But park uses in the vicinity of the Project area, and not solely beneath the area where gondolas would continuously cross through the park’s airspace, would be profoundly and adversely impacted. The DEIR fails to describe the amount of parkland area at the western edge of LASHP that is cut off, “orphaned” from the rest of the park as a narrow remainder parcel sliver. It appears to be at least several tens of thousands of additional square feet when viewed from overhead. (See DEIR, Appx. Q, p. 4.)

GO14-35

The DEIR describes approvals thought necessary from the California Department of Parks and Recreation on DEIR page 2-61:

Approvals determined necessary by the California Department of Parks and Recreation for the Project could include, but not necessarily be limited to:

- a. Pursuant to Government Code section 14666, an easement and/or aerial easement, to construct and operate the Project within/over the Los Angeles State Historic Park.
- b. Pursuant to Public Resources Code section 5003.17, a lease or other agreement, to construct and operate the Project within/over the Los Angeles State Historic Park.
- c. Pursuant to Public Resources Code Section 5003 and Government Code Section 14666, a right of entry, to construct the Project within/over the Los Angeles State Historic Park.

GO14-36

- d. Pursuant to Public Resources Code section 5002.2, an amendment to the Los Angeles State Historic Park General Plan.

As discussed in the following sections, these approvals cannot lawfully be made.

## 2. Legal framework

With “approval of the state agency concerned,” Government Code section 14666 allows grant of an easement or right-of-way “across real property belong to the state...for those purposes as the [Director of General Services] deems are in the interest of the state.” The state agency responsible for LA State Historic Park is our Department of Parks and Recreation (“DPR” or “Department”). (See Govt. Code, §§ 5001-5019.5.) DPR is the controlling authority for California state parks, which are “to be preserved and managed for the benefit and inspiration of all state residents and visitors to the state parks.” (Pub. Res. Code, § 5001, subs. (a)(2), (b).) The DPR’s Director “*shall* promote and regulate the use of the state park system *in a manner that conserves the scenery, natural and historic resources, and wildlife in the individual units of the system for the enjoyment of future generations.*” (Pub. Res. Code, § 5001.2 (emphasis added).) Similarly, the Department “*shall* administer, protect, develop, and interpret the property under its jurisdiction *for the use and enjoyment of the public.*” (Pub. Res. Code, § 5003 (emphasis added).)

The DPR is “authorized to provide means of ingress and egress” to provide access to the public. (Pub. Res. Code, § 5003.5.) And the Department has done so: one ingress/egress location is conveniently located approximately 300 feet from Metro’s L Line (Gold Line) Chinatown Station, there are several gates located along Spring St. that may be opened when access is desired, and there are two vehicle entrances/exits.

But the Department is expressly *limited* in allowing use of parkland to provide right-of-way access to *other* land. The mandatory inquiry requires the Department to consider whether the land to which access is requested already has “reasonable access.” Only where reasonable access “does not exist or cannot be economically constructed outside the boundaries of the park” may DPR grant a permit for right-of-way access across state parkland. (*Ibid.*)<sup>18</sup>

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<sup>18</sup> Public Resources Code section 5003.5 states, in its entirety:

The department is authorized to provide means of ingress to and egress from all state parks in order to provide ready access thereto by the public and to provide means of ingress and egress to highways and roads across state parks from lands separated from such highways and roads by state parks, and for that purpose may enter into contracts or agreements with cities, counties, and other political subdivisions of the State and with other state agencies or with persons, firms or corporations for the acquisition, construction, and maintenance of suitable roads, trails, and pathways.

When application is received by the department, other than under Section 5012, from any person, firm or corporation for right-of-way across a state park for ingress and egress to a highway or road from their lands separated from such highway or road by the state park, the department shall determine whether any reasonable access exists outside the boundaries of the park, or could be economically constructed.

The only reasonable interpretation of Public Resources Code section 5003.5 paragraph two is that access provided under the conditions of this section are intended for parcels that are *actually contiguous with* a state park, and cut off from a road or highway located on the far side of parkland. (Pub. Res. Code, § 5003.5, ¶ 2, describes an “application...for right-of-way across a state park for ingress and egress *to a highway or road from their lands separated from such highway or road by the state park...*” (emphasis added).)

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GO14-37

The Department may also grant permits and easements to a *public agency* for public roads, for public bicycle and pedestrian trails, and for utility lines, or for “electric, gas, water, sewer, telephone, telegraph and utility lines, and pipelines and structures incidental thereto, to perform a public service or oil or gas pipelines.” (Pub. Res. Code, § 5012, subs. (a)-(d).)<sup>19</sup> Before the DPR may lease land pursuant to Public Resources Code section 5003.17, the Director must make a finding “that the use would be compatible with the use of the real property as a unit or part of a unit and with the sound management and conservation of resources within the unit.” (Pub. Res. Code, § 5001.65.)

GO14-38

Most important, and with few exceptions (all of which are inapplicable here), **“[c]ommercial exploitation of resources in units of the state park system is prohibited.”** (Pub. Res. Code, § 5001.65.)<sup>20</sup>

### 3. Analysis

As discussed above and elsewhere, the proposed Project is *not* a public transportation project. (See discussion, *supra* pp. 8-12.) While the Project proposes that provision of new

GO14-39

FN GO14-37

Where reasonable access does not exist or cannot be economically constructed outside the boundaries of the park, the department shall grant a permit for right-of-way across the park over such route and subject to such conditions and construction and maintenance specifications as the department may determine which will cause minimum alteration to the physical features of the park and minimum interference with the use of the park by the public. The permittee shall at his own expense construct and maintain the means of ingress and egress in accordance with the terms and conditions set forth in the permit, noncompliance with which in any part shall be due cause for revocation of such permit. The department may require a permittee or permittees to allow the use of such means of ingress and egress by any other applicant whose lands are similarly situated. The department shall grant a permit for such use under terms and conditions imposed upon existing users, upon payment of a reasonable compensation for construction and maintenance of the road, by the applicant to the existing permittee, or permittees.

FN GO14-38

<sup>19</sup> Subdivisions (e) and (f) of Public Resources Code section 5012, which relate to the use of state parks for small craft harbors and recreation areas and oil and gas pipelines, are not relevant.

<sup>20</sup> In addition to the above statutory regime, which protects our state parkland from unlawful encroachment by those who would seek to use these valuable resources for personal and commercial gain, the Park Preservation Act (Pub. Res. Code, §§ 5400-5409) forbids a public entity’s (whether city, county, city and county, etc.) acquisition of existing public parkland for nonpark purposes “unless the acquiring entity pays or transfers to the legislative body of the entity operating the park sufficient compensation or land, or both.” (Pub. Res. Code, § 5401, subd. (a).) Applicability of the Park Preservation Act will be analyzed separately below.

access to LA State Historic Park will be an important feature of the Project, the Park is already well-served by existing Metro service via the Gold Line Metro Station, which operates only a few hundred feet from where the Project’s proposed Chinatown/State Park Station would be located. In addition, the DEIR provides information about local bus lines operating in the Project area, including near LASHP.

“The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property...” (DEIR, p. 2-12.) The relevant legal question to determine whether the state parkland at LASHP may be made available for the purpose of providing access to Dodger Stadium is “whether any reasonable access exists outside the boundaries of the park, or could be economically constructed.” (Pub. Res. Code, § 5003.5.)

There is but one answer possible: physical access to Dodger Stadium is plentiful.

Dodger Stadium is not made landlocked by its proximity to LA State Historic Park—it is not even immediately adjacent to LA State Historic Park. At its *nearest* point to the park Dodger Stadium is more than 1,500 feet distant. It is accessible by numerous roadways and entrances, and as the DEIR notes, on game days is already served by Metro’s Dodger Stadium Express. (DEIR, p. ES-19.) Because there are already numerous entrances to Dodger Stadium, as a matter of law it must be found that “reasonable access exists outside the boundaries of [LA State Historic Park].”

LASHP is therefore *neither necessary nor available* to provide additional Dodger Stadium with additional access it does not need. The controlling Public Resources Code section provides no exception. Moreover, since access to Dodger Stadium already exists, no “alteration of the physical features of the park” or level of “interference with the use of the park by the public” can be justified. No part of LASHP is *necessary* to provide access to Dodger Stadium, and Public Resources Code section 5003.5 therefore *prohibits* use of the park by the Project.<sup>21</sup>

The DEIR states that a secondary Project purpose is to provide access to LASHP from Union Station and Dodger Stadium and local neighborhoods near Dodger Stadium. But the DPR has already provided for adequate access to LASHP. Metro’s Gold Line Chinatown Station and several bus lines already provide convenient public transportation to the park, and many people arrive by bicycle or on foot. It is noteworthy that ARTT LLC approached Metro and the Department with its proposal. DPR did not ask for help increasing park access, because it has already provided adequate access.

Moreover, these alleged access enhancements are illusory and speculative. On days where there is no baseball game or other event at Dodger Stadium, the Project would operate at the discretion of the operator, not on a regular schedule. As the DEIR notes, service would vary, “based on demand.” (DEIR, p. 2-42.) If demand is insufficient, nothing guarantees that the Project will operate. Likewise, travel *to* the Park from Dodger Stadium station for neighborhoods

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GO14-39

GO14-40

GO14-41

FN GO14-40 <sup>21</sup> It makes no difference under Public Resources Code section 5003.5 whether access being sought is ground-based or aerial. The statute makes no distinction between provision of ground or aerial access.

near Dodger Stadium is subject to private approval and is completely speculative. (DEIR, p. ES-10: “The Project Sponsor *will request consideration* by the Los Angeles Dodgers *of the potential* for the Dodger Stadium Station to include a mobility hub where outside of game day periods, passengers would be able to access a suite of first and last mile multi-modal options, such as a bike share program and individual bike lockers, to access Elysian Park and other nearby neighborhoods, including Solano Canyon.”)

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GO14-41

Further, the DEIR analysis of neighborhood ridership is deeply flawed. First, as noted above it relies on the speculative availability of Dodger Stadium Station, and then arbitrarily doubles the size of the surveyed ridership area around the stadium from a half-mile walking distance to an entire mile, assuming that the same number of people who might walk half a mile would also ride bicycles up to a mile. (DEIR, p. 3.17-25.) Second, the DEIR does not analyze, or even discuss, the hilly topography of the neighborhoods surrounding Dodger Stadium that would allegedly be served by a new mobility hub, assuming it is ever built. There seems to have been no survey of potential Dodger mobility hub users to determine whether they either would walk or ride to a hub facility. Third, the park user ridership analysis assumes, without evidentiary support, that 10% of existing Gold Line users to the park would instead use the gondola, assuming there is enough demand that it is running at the time. (*Ibid.*)

GO14-42

Finally, Public Resources Code section 5012 is not applicable to the Project with respect to the Project’s proposed use of LASHP. No public agency is requesting access for the purpose of providing roads, public bicycle or pedestrian trails, or utility lines. No request is being made for “electric, gas, water, sewer, telephone, telegraph” or other utility lines. No public or private entity is requesting use of the park for oil or gas pipelines.

The Project request is for access as a *private* transportation project to serve a commercial sports and entertainment venue with existing substantial access, including convenient access by *public* transportation (Dodger Stadium Express). While the DEIR suggests the Project would be nominally open to the public when it is operating, on Dodger game days or for special events at Dodger Stadium, Dodger ticket holders (and presumably special event patrons) would have priority access to gondola use. (DEIR, p. 3.17-25.)

GO14-43

As explained above, the Project is not public transportation. It is better described as a “courtesy shuttle service for patrons of one or more specific establishments” (see 42 U.S.C., § 5302 subd. (B)). In other words, the DEIR description of the Project as open to the public (except when it isn’t) doesn’t change that the gondola is a *commercial* private transit enterprise to benefit Dodger Stadium and whatever future development might one day be built there. “Commercial exploitation of resources in units of the state park system is prohibited.” (Pub. Res. Code, § 5001.65 (emphasis added).)

#### 4. Conclusion

Based on the above, LA Parks Alliance *strongly* objects to *any* use of LASHP for the Project’s private commercial use. Construction and operation of the Project within LA State Historic Park would plainly violate state law that protects units of state park system from

GO14-44



commercial exploitation. Nor is there any exception within the relevant statutes that allows for the Director and Department to agree to unlawful commercial exploitation of LA State Historic Park to take advantage of proposed desirable Project features (for example, a mid-park bridge across the Gold Line rail to Broadway, an enhanced concession area, a mobility hub). Should the Director and Department do so, they would violate the fundamental duties set forth in Public Resources Code sections 5001, 5001.2, 5001.65, 5003, 5003.5, 5003.17, and other statutes.

The Department *must* manage state park units “for the benefit and inspiration of all state residents and visitors to the state parks,” and the Director must conserve “the scenery, natural and historic resources, and wildlife in the individual units of the system for the enjoyment of future generations.” (Pub. Res. Code, § 5001, subd. (a)(2), and § 5001.2.) **Commercial use of the state parks is prohibited.** (Pub. Res. Code, § 5001.65.)

The proposed Project may not lawfully use *any* part of LA State Historic Park for access to Dodger Stadium, including its airspace.

#### **E. The Public Park Preservation Act and Other Relevant Statutes Prohibit Use of LA State Historic Park for Non-Park Uses.**

Public comments submitted during the scoping comment period show that many community members object to use of public parkland for the private commercial gondola project. A representative sample included in DEIR Appendix A follows:

- Email comment of Julie Rico, Nov. 7, 2020: I am concerned about the potential negative impacts of the proposed Los Angeles Aerial Rapid Transit project on Los Angeles State Historic Park which we view as the greatest threat to Northeast Los Angeles open space in over 20 years.
- Comment of Tom Norris, Nov. 12, 2020: “Los Angeles State Historic Park (LASHP) is a unique public open space with historical significance and strong community ownership... This is a park space that is used often by family and friends, especially now when meeting outdoors in open spaces is the only safe option during this Covid health crisis. We do not want to give our public lands over to the McCourt family!”
- Email comment of Phyllis Ling, Nov. 16, 2020: “[T]his gondola would cut through the middle of the Los Angeles State Historic Park. This project would be at the expense of the Chinatown Community, who fought hard for this open space, rather than see it turned into an industrial office park. After it was dedicated as park land, the community waited many more years for construction to be completed. And now, just as we are beginning to enjoy this open space, a private company wants to cut through the heart of the park with this massive monstrosity. This is offensive, especially as the City is making efforts to advance social equity. This public resource in a low income community must not be sacrificed to a private company for private gain.”

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GO14-44

GO14-45

- Comment of Jeff Pawling, Nov. 17, 2020: “Personally, I oppose this gondola system being constructed over the Los Angeles State Historic Park. If Frank McCourt couldn’t deliver a World Series to LA, why would we deliver him a tram over a beloved and beautiful park? This EIR needs to address the exact route the proposed gondola would take over the park and how it would affect the park as a whole both during and after construction. There are simply other efficient modes of transportation that can be utilized to transport people to and from Dodger Stadium that do not involve a gondola.”
- Comment of Philip Lee, Nov. 17, 2020, who requests: “Full transparency on the rapid transit and how it affects public lands. McCourt should not be given any public land.”
- Letter comment of Los Angeles River State Park Partners, Nov. 10, 2020, p. 2: “Los Angeles State Historic Park is now a gem among the State Parks in the Los Angeles area and a national model for urban parks. But the State’s major investment that made LASHP possible may be at risk if private interests are allowed to spoil the public good represented by the park.”

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GO14-45

In addition to the express limitations of Government Code sections 5001 through 5019.5 discussed above, the California Public Park Preservation Act and other statutes detail additional limitations on the use of California parkland resources, and in particular on state park historical units. Our legislature has enacted strict limitations on how California parklands may be used, whether by public agencies or by private actors who would exploit these precious resources.

GO14-46

The loss of any parkland for the benefit of the Project constitutes a significant and unavoidable environmental impact, requiring denial of the Project or selection of a feasible alternative. (Pub. Res. Code, § 21002: “The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives...”)

**1. The Public Park Preservation Act does not authorize acquisition of public parks, including LA State Historic Park, for use by the Project.**

The Public Park Preservation Act of 1971 (“Park Preservation Act” or “Act”) (Public Resources Code sections 5400–5409) forbids the acquisition of land by a public agency if the land to be acquired is already in use as a public park at the time of acquisition, “unless the acquiring entity pays or transfers to the legislative body of the entity operating the park sufficient compensation or land, or both...” (Pub. Res. Code, § 5401(a).) While the Park Preservation Act nominally restricts only public agencies, that does not mean such acquisitions are permitted by private entities or actors (since other generally applicable Public Resource Code sections already restrict these actions — see Part. I(D), *supra* pp. 12-18). The Park Preservation Act thus provides no alternative vehicle for Metro (or ARTT LLC or any other entity) to acquire any portion of LA State Historic Park for the benefit of the proposed Project.

GO14-47

Although it is clearly not possible for ARTT LLC to acquire any portion of LA State Historic Park for the Project pursuant to the Park Preservation Act, it is nonetheless appropriate to briefly review the Act to illustrate the nature of limitations that would be imposed on public agencies were such an agency inclined to attempt use of the Act’s procedures to assist the Project proponent. The DEIR is incomplete in not including this important background information to assist decisionmakers and members of the public in understanding that even a state agency could not acquire this land for the benefit of the Project.

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As noted above, the basic premise of the Park Preservation Act is explained in Public Resources Code section 5401, subdivision (a), which states in its entirety:

No city, city and county, county, public district, or agency of the state, including any division, department or agency of the state government, or public utility, shall acquire (by purchase, exchange, condemnation, or otherwise) any real property, which property is in use as a public park at the time of such acquisition, for the purpose of utilizing such property for any nonpark purpose, unless the acquiring entity pays or transfers to the legislative body of the entity operating the park sufficient compensation or land, or both, as required by the provisions of this chapter to enable the operating entity to replace the park land and the facilities thereon.

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Stated differently, the Parks Preservation Act allows a California public agency (but not a private entity or actor) to acquire existing parkland and use it for a non-park purpose, so long as the “acquiring entity pays or transfers” “sufficient compensation or land, or both,” to the public agency that operates the existing parkland. But this general premise operates within very strictly defined limitations, as explained in subsequent sections of the Act.

Initially, it is important to note that none of the express exceptions of the Act apply to transportation infrastructure, whether private or public. The first exception relates to “the construction or maintenance of underground utility services.” (Pub. Res. Code, § 5402.) The second exception is for a public utility (public or private) acquiring land to provide services to the park and where the services cannot feasibly be located underground. (Pub. Res. Code, § 5403.) The third exception relates to a public utility (public or private) acquiring an interest in a waterway. (Pub. Res. Code, § 5403.5.)

Since no exception applies, a public agency might acquire land at LA State Historic Park, but only if it first provided the *cost* of substitute park land, *actual* substitute park land, or some combination of the two. But “cost of acquiring substitute park land” means providing sufficient payment to cover:

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[L]and of comparable characteristics and of substantially equal size located in an area which would allow for use of the substitute park land and facilities by generally the same persons who used the existing park land and facilities, and the cost of acquiring substitute facilities of the same type and number, plus the cost of

development of such substitute park land, including the placing of such substitute facilities thereon.

(Pub. Res. Code, § 5405, subd. (a).)

Likewise, “substitute park land” provided by the acquiring agency means:

[Land] of comparable characteristics and of substantially equal size located in an area which would allow for use of the substitute park land by generally the same persons who used the existing park land, and the cost of acquiring substitute facilities of the same type and number, plus the cost of development of such substitute park land, including the placing of such substitute facilities thereon.

(Pub. Res. Code, § 5405, subd. (b).)<sup>22</sup>

The proposed Project cannot utilize the Park Preservation Act because no public agency seeks to be the “acquiring entity” of LA State Historic Park land on its behalf. The DEIR nonetheless fails as an informational document because it evaluates neither the availability nor cost of substitute park land to adequately compensate the people of California for use of public parkland that has been set aside and held in trust for their benefit. See California Public Resources Code, section 5019.91, subdivision (b):

**The mission of the California State Park system** is to provide for the health, inspiration, and education of the people of California by helping to preserve the state’s extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.

**State parks are set aside** to protect their natural, historical, cultural, and recreational values **in perpetuity for the people of the state.**

(Emphasis added.)

The Park Preservation Act also allows for improvement of unacquired park land in lieu of acquiring substitute park land. (Pub. Res. Code, § 5404.) However, that alternative would still require the acquiring agency to account for and pay the entire cost in land or compensation as described in Public Resources Code section 5405. Moreover, it would only be possible where the land to be acquired is “less than 10 percent of the park land, but not more than one acre.” (*Ibid.*) Here, the footprint of the proposed Project’s Chinatown/State Park Station is “2,195 square feet in the park, and the station canopy would have an overhang of 9,320 square feet over the park.” (DEIR, p. 3.11-38.) This is both less than ten percent of the 32-acre park and less than an acre. But it does not account for the massive use of airspace required for the Project (almost 60,000 square feet as seen from an overhead view, a number which does not include the vague “Additional Separation Buffer”). (DEIR, p. 2-52.) The Project would therefore utilize well over an acre of LA State Historic Park land, and the “in lieu” alternative would not be available to a public agency desiring to acquire the land for a non-park purpose. (As discussed, a private entity cannot take the land at all.)

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FN GO14-49 <sup>22</sup> Any combination of exchange of substitute park land and payment to allow acquisition of new substitute park land must meet the same standard. (Pub. Res. Code, § 5405, subd. (c).)

The informational value of the Park Preservation Act is to assist the public in understanding underlying limitations on the use of public parkland. Only an absolutely absurd interpretation of the statutes describing the fundamental duties, powers, and authorities of the Department of Parks and Recreation and the Director of Parks could lead one to conclude that even though no public agency can use public parkland without adequately compensating the people of California for land held *in perpetuity*, that the Director and Department could quietly negotiate with a private actor to allow acquisition or exchange of parkland for non-park use for only minor improvements without considering the cost and availability of “substitute park land” or calculating and obtaining that value.<sup>23</sup>

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To be clear, the Public Park Preservation Act is not applicable to the Project. It does, however, inform the propriety of a monetary or land exchange, if one were possible, or the offer of public benefits such as park improvements in exchange for use of public parkland. It provides at least one basis to consider the amount of compensation necessary to justify a private taking of land meant to be held in perpetuity by and for the people of California, assuming such a taking is permissible, which it is not. The DEIR fails as an informational document for failing to provide this information. The DEIR acknowledges that LA State Historic Park serves “a region that has been historically limited in terms of access to parkland” (DEIR, p. 2-9), but it does not include the information necessary to allow members of the public and decisionmakers to understand the profound impacts the significant loss of public parkland at LA State Historic Park would have.<sup>24</sup>

## 2. Public Resources Code section 5019.59 prohibits use of LA State Historic Park for the Project.

There are also several Public Resources Code sections specifically relevant to the proposed Project because of its proposed use of LA State Historic Park. For example, Public Resources Code section 5019.50 requires that “[a]ll units that are...a part of the state park system...shall be classified by the State Park and Recreation Commission into one of the categories specified in [Article 1.7 of Chapter 1 of the Public Resources Code].” LA State Historic Park, as its name suggests, is classified as a “historical unit.” (Pub. Res. Code, § 5019.59; see DEIR, pp. 3.11-1 to 3.11-2, 3.11-38.)

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Historical units of the state park system are expressly limited in the type and nature of development allowed within the unit. As the DEIR notes, the primary purpose of historical units

<sup>23</sup> As discussed, this is “land of comparable characteristics and of substantially equal size located in an area which would allow for use of the substitute park land by generally the same persons who used the existing park land, and the cost of acquiring substitute facilities of the same type and number, plus the cost of development of such substitute park land, including the placing of such substitute facilities thereon.” (Pub. Res. Code, § 5405, subd. (b).) LA Parks Alliance does not believe such land exists.

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<sup>24</sup> While the discussion in this section is focused on the significant adverse impact and the DEIR’s lack of useful information with respect to compensation for loss of land at LA State Historic Park, LA Parks Alliance notes that it is equally applicable to El Pueblo de Los Angeles Historical Monument. See also discussion re Land Use and Planning conflicts, *infra* pp. 73-75.

is “to preserve objects of historical, archaeological, and scientific interest, and archaeological sites and places commemorating important persons or historic events.” (Pub. Res. Code, § 5019.59; DEIR, p. 3.11-38.) Under state law, development is therefore dramatically limited:

*The only facilities that may be provided* are those *required* for the safety, comfort, and enjoyment of the visitors, such as access, parking, water, sanitation, interpretation, and picnicking. Upon approval by the commission, lands outside the primary historic zone may be selected or acquired, developed, or operated to provide camping facilities within appropriate historical units. Upon approval by the State Park and Recreation Commission, an area outside the primary historic zone may be designated as a recreation zone to provide limited recreational opportunities that will supplement the public’s enjoyment of the unit. Certain agricultural, mercantile, or other commercial activities may be permitted if those activities are a part of the history of the individual unit and any developments retain or restore historical authenticity.  
(Pub. Res. Code, § 5019.59 (emphasis added).)

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The DEIR notes that the Project conflicts with the Park’s General Plan, which does not permit the Project. It provides a conclusory rationale that the park’s General Plan may be revised to allow for “transit,” and argues that if the General Plan is so revised the Project will then be consistent with LA State Historic Park’s General Plan *and with* Public Resources Code section 5019.59, “which permits facilities for the comfort and enjoyment of the visitors, such as access.” (DEIR, p. 3.11-42.) But the DEIR’s analysis of Public Resources Code section 5019.59 is grossly incomplete, suggesting that so long as proposed development is within the list of items (access, parking, water, sanitation, interpretation, or picnicking) there is no further analysis necessary. But of course there is.

The plain text of the statute does not permit any and all development that might be made “for the comfort and enjoyment” of park visitors. Public Resources Code section 5019.59 uses the word “required” to modify and limit the type and amount of development at a state park historical unit. As already discussed, the Park has plentiful access via several entrances, and is already served by existing Metro train service and numerous bus lines. Further development to provide additional access is not *required*. Nothing in the DEIR provides substantial evidence to support a contrary conclusion.

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Further, and as already discussed, on days where no baseball game or event is held at Dodger Stadium, the Project would operate at the discretion of the operator, not on a regular schedule. Service would vary “based on demand.” (DEIR, p. 2-42.) Nothing guarantees the Project will operate daily to provide Park access. Travel to the Park from Dodger Stadium station for neighborhoods near Dodger Stadium is subject to private approval and thus completely speculative. (DEIR, p. ES-10.) And on Dodger game or stadium event days, use of the Project to get to the Park would be secondary to ticket holders’ preferred use. (DEIR, p. 3.17-25.)

Appendix N’s meager analysis of ridership for users of LA State Historic Park is incomplete and entirely speculative. The DEIR provides no discussion of *daily* ridership use for

LASHP, whether from the Project’s Union Station terminus or Dodger Stadium terminus. (DEIR, Appx. N Ridership Model, pp. 13-14, 15-16.) It only analyzes ridership to special events at the Park. Even then, the Fehr & Peers Ridership Model Development report acknowledges that it is entirely based on guesswork. “No data are available for mode share of attendees travelling to events at the Park. For the purposes of this analysis, Fehr & Peers assumed a 10% mode split for attendees taking transit from Union Station.” (*Ibid.*, p. 13.)

Thus, the DEIR *assumes with no apparent basis or supporting data* that on special event days as many as 10% of park visitors traveling from LA Union Station to the Park would instead use the Project for access. (DEIR, p. 3.17-26.) Put another way, the DEIR acknowledges that 90% of park special event riders from Union Station would arrive some other way than the Project. If not for the Project siphoning off a small percentage of park visitors, 100% would have little difficulty in arriving via existing alternatives. Even assuming the 10% assumption were true, and no substantial evidence supports it, how does the DEIR’s best case assumption concluding that 90% of visitors arriving from Union Station by means other than the Project support a conclusion that it provides *required* access? This is the only relevant question for development of historical unit under Public Resources Code section 5019.59.

Likewise, discussion of neighborhood ridership does not describe in any detail the number of people who would use the Project to travel from the Dodger Stadium terminus and depart at the Chinatown/State Park Station, assuming the Project even runs on non-Dodger game or event days. Using information provided in the DEIR it is impossible to conclude that a significant number of LA State Historic Park users would arrive via the Project. The analysis does not distinguish between those who depart the Project at Chinatown/State Park Station to go to the Park as opposed to other destinations. (DEIR, Appx. N Ridership Model, p. 21.) There is no substantial evidence to show the Project is *required* to provide access to LA State Historic Park, the mandatory finding required by Public Resources Code section 5019.59.

An additional limitation of Public Resources Code section 5019.59 restricts commercial activities. The project is *not* a public transportation project. It will be privately built and operated to transport ticket holders to Dodger Stadium for baseball games and private events, a commercial activity. Commercial activities are only permitted at historic units of the state park system when they “are a part of the history of the individual unit and any developments retain or restore historical authenticity.” (Pub. Res. Code, § 5019.59.) Obviously, the Project has nothing to do with the historic identity of LA State Historic Park. Since the DEIR does not provide sufficient evidence to show that the Project is *required* to provide access to LA State Historic Park, it must be considered a prohibited commercial activity.

The Department of Parks and Recreation has jurisdiction over LA State Historic Park and may amend its General Plan to permit lawful activities, but it does not have the ability to modify the General Plan to allow *commercial* activities in violation of Public Resources Code section 5019.59. (See Pub. Res. Code, § 5001.65: “Commercial exploitation of resources in units of the state park system is prohibited.” And see Pub. Res. Code, § 5009.53: “Improvements [to state park units] that do not directly enhance the public’s enjoyment of the natural, scenic, cultural, or ecological values of the resource, *which are attractions in themselves*, or which are otherwise

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available to the public within a reasonable distance outside the park, *shall not be undertaken within state parks.*” (Emphasis added.)

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The Department simply cannot modify the General Plan for the benefit of the Project.

The DEIR fails to identify the significant and unavoidable land use conflict between the Project and Public Resources Code section 5019.59. No Project alternative including an alignment on or over LA State Historic Park can be built, because the Department of Parks and Recreation may not approve a facility that is not *required* for access and may not approve commercial activity with no historic connection to a historical unit of the state park system.

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**F. Project Approval Would Pre-Commit the Future Discretion of State and Local Officials, in Conflict with the California Constitution and State and Local Law.**

Proposed Project approvals with the City include a development agreement and franchise agreement. (DEIR, pp. 2-61 to 62.) Approvals for the use of airspace over LA State Historic Park, which are not lawfully available to the Project, would require an amendment to the park’s general plan and an easement and/or aerial easement pursuant to Govt. Code section 14666 and a lease or other agreement under Public Resources Code section 5003.17 to allow construction and operation on and over the park. (*Ibid.* at p. 2-61.)

A development agreement with the City of Los Angeles would be limited to 20 years. (*Ibid.*) A franchise agreement with the City is limited to 21 years. (Los Angeles City Charter, § 390, subd. (c).)

Franchises of up to 40 years may be granted “for the construction and operation of subways, elevated railways and grade separated railways.” (LA City Charter, § 390(c).) The Project is none of these and so is limited to a maximum length of 21 years. LA Parks Alliance notes that, unlike the secretive sole source contract awarded to ARTT LLC, before the City may grant *any* franchise, the City Council *must* “advertise its intention to grant the Franchise and shall award the Franchise to the highest responsible and responsive bidder after competitive bidding, in accordance with the procedures prescribed by ordinance governing the granting of Franchises.” (*Ibid.*, subd. (b).)

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Even if the Project could lawfully obtain the necessary approvals to operate on and over LA State Historic Park, and it cannot, agreements made with the Department of Parks and Recreation may not exceed *10* years, unless a future “Joint Legislative Budget Committee” agrees with the Department’s extension of the agreement (Pub. Res. Code, § 5003.17, subd. (d)(2).) Project approvals made now would therefore tie the hands of future City and state elected officials, precluding them from exercising their complete authority and discretion to choose not to renew the development agreement, franchise agreement, and lease or other agreements necessary for the project to move forward.

Given the express limitations of the public resources code to limit agreements for the use of state park resources to no more than 10 years, with extensions beyond that time made under



the sole authority of a *future* joint legislative budget committee based on documentation to be provided by a *future* Director, it would be highly improper for the Department of Parks and Recreation to enter into an agreement to construct private infrastructure that would nullify the discretion of a future Director and future members of the joint legislative budget committee. Initial approval of such a lease agreement by the current Department and Director, part of the *executive* branch of our state government, even assuming it is lawful in the first instance which it is not, would pre-commit the future discretion of *elected* legislators by creating a status quo that would be impossible to undo. The pre-commitment necessary to approve the Project for a term longer than the legislature has permitted violates basic separation of powers principles under the California Constitution and hamstring the discretion of future elected officials from disapproving the continuation of the Project.<sup>25</sup>

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The DEIR fails to adequately describe or engage with any of the above limitations and therefore fails as an informational document.

## **G. The DEIR Engages in Improper Project Piecemealing by Failing to Consider or Analyze Foreseeable Development of Land Around Dodger Stadium.**

### **1. Legal background**

The California Environmental Quality Act’s definition of “project” contains one of the fundamental black letter law concepts of California environmental law: “‘*Project*’ means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a *reasonably foreseeable indirect physical change in the environment.*” (CEQA Guidelines, § 15378 (emphasis added).) “‘*Project*’ is given a *broad interpretation ... to maximize protection of the environment.*” (*Riverwatch v. Olivenhain Mun. Water Dist.* (2009) 170 Cal.App.4th 1186, 1203 (emphasis added).) Project descriptions must accurately reflect the whole of the action considered. (*McQueen v Board of Dirs.* (1988) 202 Cal.App.3d 1136, 1144.)

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It is improper to divide a single CEQA “project” into smaller sub-projects to evade review of the entire scope of project impacts, a practice known as “piecemealing.” “CEQA ‘cannot be avoided by chopping up proposed projects into bite-sized pieces’ which, individually considered, might be found to have no significant effect on the environment.” (*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1223.) Our courts prohibit piecemeal review, in part, to protect public participation in the decisionmaking process, requiring that members of the public and decisionmakers are adequately informed “of the environmental consequences of decisions *before* they are made. (*Berkeley Keep Jets Over the Bay Com. v. Board of Port Cmrs.* (2001) 91 Cal.App.4th 1344, 1356 [emphasis in original].)

<sup>25</sup> See Cal. Const., art. III, § 3: “The powers of state government are legislative, executive, and judicial. Persons charged with the exercise of one power may not exercise either of the others except as permitted by this Constitution.” “The purpose of the [separation of powers] doctrine is to prevent one branch of government from exercising the *complete* power constitutionally vested in another...” (*Younger v. Superior Court* (1978) 21 Cal.3d 102, 117.)

In considering whether an EIR is legally adequate, courts look “not for perfection but for adequacy, completeness, and a *good faith effort at full disclosure*.” (*California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 262, quoting CEQA Guidelines, § 15151 (emphasis added); see DEIR, p. ES-2.) However, “the fact that a particular development which now appears reasonably foreseeable may, in fact, never occur does not release it from the EIR process. [Citation.] Similarly, the fact that future development may take several forms does not excuse environmental review.” (*City of Antioch v. City Council* (1986) 187 Cal.App.3d 1325, 1338.)

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## 2. **Piecemealing concerns were raised in scoping comments; the DEIR ignored the comments and evidence of foreseeable development.**

Future development of Dodger Stadium parking lots represents a “foreseeable indirect physical change in the environment” due to the proposed Project that must be considered in the environmental review process. A significant number of comments received during the Project’s scoping process raised concerns regarding foreseeable future development of land around Dodger Stadium that is currently used for parking.

For example, one scoping commenter questioned the purpose of the Project’s intermediate stop (the Chinatown/State Park Station), “[u]nless someone is planning to build a mall or entertainment complex in the area — perhaps in the freed-up Dodger parking lots? — then the additional stop is a waste of resources that will damage the biological and social environment. Are such plans afoot?”<sup>26</sup> Another wondered, “[w]hat are the plans to develop the Dodger [sic] Stadium parking lot? Will the LA ART be used year-round? Doubt this expensive system is being created just for Dodger games.”<sup>27</sup> Chinatown stakeholder King Cheung expressed suspicion of the Project: “Why spend \$125 millions to build a gondola just to transport people to the Dodgers games? Mc Court [sic] does not own the Dodgers anymore. So it is an expense venture. What does he gain? What is his future goal? Build a downtown Disney type of entertainment center on the empty parking lots?”<sup>28</sup>

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In a joint letter from The California Endowment and Homeboy Industries to then-Metro CEO Phillip A. Washington and then-Los Angeles Mayor and Metro Board Chair Eric Garcetti asked simply, leaders of these vital local nonprofits asked simply: “**What is the proposed future use of the vacant parking lots at Dodger Stadium caused by the Project?**”<sup>29</sup>

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<sup>26</sup> Janet Owen Driggs, email to Cory Zelmer, Nov. 17, 2020, DEIR, Appx. A, pdf. p. 314.

<sup>27</sup> Patricia Perez, LA ART Virtual Scoping Meeting comment, Oct. 22, 2020, DEIR, Appx. A, pdf. p. 502.

<sup>28</sup> King Cheung, scoping comment email to laart@metro.net, Nov. 16, 2020, DEIR, Appx. A, pdf. p. 177.

<sup>29</sup> Dr. Robert K. Ross, MD (The California Endowment) & Father Gregory Boyle, S.J. (Homeboy Industries), joint comment letter to Phillip A. Washington re NOP comments for LA ART Project, Nov. 16, 2020, p. 12. This letter is already part of the administrative record for the proposed Project.

The question of future Dodger Stadium development was also important to Metro at one point—enough so that in asking for information about ARTT LLC’s business plan for the project, Metro explained ARTT LLC should “outline the following: ... Future plans at Dodger Stadium site.” (Los Angeles Aerial Rapid Transit, Response to Metro Request for Information, Sept. 2018, pp. 12-13.)<sup>30</sup> Just as the DEIR fails to address scoping comment concerns about development at Dodger Stadium, ARTT LLC’s response interprets the question narrowly: “The only plan for Dodger Stadium related to the ART is to provide a station on the Dodger Stadium property, together with appropriate pedestrian connections from the station to the stadium.” (*Ibid.*, p. 13.) The DEIR makes no mention of potential development plans at Dodger Stadium, despite widespread media attention on such plans locally for well over a decade, so ARTT LLC’s strategy of interpreting the broad question narrowly seems to have worked. But it has not worked with community members who demand more information.

ARTT LLC’s narrow interpretation of Metro’s request for information makes no sense. Metro already knew from the basic premise of the Project that it would include a gondola station at or near LA Union Station and at Dodger Stadium. A reasonable interpretation of Metro’s question could thus only have been to ask about *other* development, in *addition* to the Project’s Dodger Stadium Station. Allowing ARTT LLC, owned by McCourt Global, to evade such a fundamental question is either naïve or disingenuous on Metro’s part. But even if Metro believes there are no future development plans, as lead agency under CEQA it has an independent duty to consider foreseeable indirect physical changes to the environment due to the Project.

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Perhaps Metro didn’t consider Dodger Stadium parking lot development foreseeable. This is far-fetched, but not impossible.

But this is why CEQA has a scoping comment process, so community members and responsible and trustee agencies can raise their own questions and concerns, including consideration of potential indirect physical changes in the environment the lead agency may have inadvertently overlooked. (See CEQA Guidelines, § 15083.) If Metro thought Dodger Stadium development was not a reasonably foreseeable indirect change in the environment before scoping, after receiving so many scoping comments they could no longer ignore it. Yet they did.

A review of scoping comments is informative.

Commenter Susan Karat MacAdams cited a story published by the Los Angeles Times in 2012, in which Times’ writer Bill Shaikin described land-use documents associated with the sale of the Los Angeles Dodgers from Frank McCourt to current-owner Guggenheim Baseball.<sup>31</sup>

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<sup>30</sup> This document should be in the administrative record of the case, but is also attached as **Exhibit H**.

<sup>31</sup> See DEIR, Appx. A, Susan Karat MacAdams letter to Cory Zelmer, Nov. 16, 2020, p. 2, citing and quoting Bill Shaikin, *Dodgers’ owners to pay \$14 million a year to rent parking lots from McCourt entity*, LA Times, May 4, 2012, available at <https://www.latimes.com/sports/la-xpm-2012-may-04-la-sp-0505-dodgers-land-20120505-story.html>. The Shaikin article is attached as part of **Exhibit I**.

MacAdams' letter quotes portions of the article highly relevant to foreseeable future development at the Dodger Stadium parking lots:

The Dodgers' new owners will pay \$14 million per year to rent the parking lots from an entity half-owned by Frank McCourt, according to **land-use documents intended to "facilitate the orderly development" of the property surrounding Dodger Stadium.** [¶] **The potential uses for the property include shops and restaurants, homes and offices, and another sports venue, according to documents obtained Friday by The Times.** The documents also discuss the possibility of parking structures on the land...citing as examples the restaurants and clubs surrounding AT&T Park in San Francisco and Petco Park in San Diego.  
(*Ibid.*, emphasis added.)

Shaikin's article reports that the land-use documents were withdrawn from the Dodgers' bankruptcy proceedings after an attorney for the Times objected to the documents having been filed under seal. They were filed with the Los Angeles County Recorder's office shortly thereafter when McCourt's sale of the Dodgers to Guggenheim Baseball was made final. (Shaikin, *supra* fn. 31.)

A document entitled "Declaration of Covenants, Conditions, Restrictions and Easements for Chavez Ravine" (hereinafter "Chavez Ravine CC&Rs") is clearly one of the documents referenced in the Shaikin article, as it was executed on April 27, 2012, and recorded May 1, 2012, several days before the Shaikin article was published.<sup>32</sup> As accurately reported by the Los Angeles Times, the agreement is intended, in part, to "*facilitate the orderly development*" of the Dodger Stadium parking lots (then owned by an entity named "Blue Landco LLC"). (Chavez Ravine CC&Rs, pp. 1-2 (emphasis added).) As Shaikin reported, Blue Landco LLC was co-owned by former Dodger owner McCourt and "an entity affiliated with the new team owners."<sup>33</sup> The agreement contemplates that Landco would gain control of the Dodger Stadium parking lot areas upon construction of parking structures, which would free up space in the parking lot areas to allow for development to occur. (Chavez Ravine CC&Rs, p. 2.) The agreement requires efforts to reduce the amount of parking utilized by Dodger Stadium patrons, including by developing what the agreement refers to as "Mass Transportation." (*Ibid.*, pp. 26-27.) This would allow the required number of vehicle spaces to be reduced first from 19,000 to 16,500 (*ibid.*, p. 11), and with approval of the City of Los Angeles, to below 16,500. (*Ibid.*, pp. 11, 26-27.)

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<sup>32</sup> Declaration of Covenants, Conditions, Restrictions and Easements for Chavez Ravine, recorded May 1, 2012, is attached as **Exhibit J**.

<sup>33</sup> Shaikin, *supra* note 31. While details regarding stadium and parking lot ownership are interesting, and to some degree relevant as the Project proponent is owned or controlled by McCourt, the *primary relevance* of the agreement in the CEQA analytic context is the *foreseeability of future development* of Dodger Stadium parking lots, not development of them by any particular individual or entity.

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Article IV, subdivision 4.1 of the agreement lays out Blue Landco LLC’s rights to pursue development of substantial commercial, residential, medical, academic, and other structures and facilities:

The Parties acknowledge that Landco, in the future, may apply for governmental approvals for future development on the Landco Parcels (the “**Development**”), which Development may include, but shall not be limited to, (i) office buildings, (ii) hotel and exhibition facilities, (iii) residential buildings, (iv) medical buildings, (v) academic buildings, (vi) parking structures, and/or (vii) retail, dining and entertainment facilities.

(*Ibid.*, p. 25.)

The Shaikin article relates substantial evidence that future development of Dodger Stadium due to the Project is not only foreseeable, but likely. This substantial evidence, without more, is sufficient to show that development of the Dodger Stadium parking lots is a “reasonably foreseeable indirect physical change in the environment” due to the Project. (See CEQA Guidelines, § 15378.) The available evidence shows such development is not only foreseeable but has actually been foreseen and planned for by former Dodger owner Mr. McCourt (who coincidentally owns or controls the Project proponent, ARTT LLC). Metro’s apparent failure to already have investigated, analyzed, and discussed the obviously foreseeable indirect physical change in the environment and its potentially significant environmental effects through the Project DEIR after receiving queries from many scoping commenters is unacceptable.

Moreover, there is far more evidence showing that Dodger Stadium development is foreseeable, much of it (including the already-cited 2012 Bill Shaikin article) publicly known and reported on in local and national media for well over a decade, including reporting on former Dodger owner McCourt’s earlier development plans:<sup>34</sup>

- Bill Shaikin and David Zahniser, *Dodgers to add shops, a museum, and garages*, LA Times, Apr. 24, 2008, available at: <https://www.latimes.com/archives/la-xpm-2008-apr-24-sp-dodrep24-story.html> (describing a letter sent to Dodger season ticket holders regarding a plan “to transform at least part of the parking lot into an area offering dining and shopping for fans who arrive early and stay late, avoiding pregame and postgame traffic”).
- Dakota Smith, *New Dodgers Stadium Reveal: We Got Trees!*, Curbed Los Angeles, Apr. 24, 2008, available at: <https://la.curbed.com/2008/4/24/10572290/dodger-stadium-2> (describing a press release from former Dodger owner Frank McCourt and noting Dodger Stadium would be “a place to visit year-round to shop, dine and play”).
- Dylan Hernandez and Bill Shaikin, *Stadium makeover is unveiled*, LA Times, Apr. 25, 2008, available at: <https://www.latimes.com/archives/la-xpm-2008-apr->

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<sup>34</sup> The cited articles, as well as select images from the “On deck: Dodger Stadium Renovations (photo slideshow)”, are attached as **Exhibit I**.

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[25-sp-stadium25-story.html](#) (describing the same \$500M project, which would occupy “about 15 acres of parking, or about 2,000 spaces”).

- On deck: Dodger Stadium Renovations (photo slideshow), LA Times, Apr. 2008, available at: <https://www.latimes.com/sports/la-dodger-stadium-improvements-pg-photogallery.html> (photo slideshow documenting Frank McCourt’s public unveiling of \$500M proposed Dodger renovations with elected officials, media, and beloved Dodger announced Vin Scully – see select photos in Exhibit I).<sup>35</sup>
- Bill Shaikin, *Rick Caruso, Joe Torre withdraw from bidding to buy Dodgers*, LA Times, Feb. 23, 2012, available at: <https://www.latimes.com/archives/blogs/dodgers-now/story/2012-02-23/rick-caruso-joe-torre-withdraw-from-bidding-to-buy-dodgers> (noting that Los Angeles developer and former mayoral candidate Rick Caruso and former Dodgers manager and famed MLB executive Joe Torre withdrew from bidding on the Dodgers in early 2012 because then-owner Frank McCourt refused to include the Dodger Stadium parking lots as part of the sale. The article noted this was “the clearest evidence yet that McCourt intends to keep the lots and try to build on them.”)
- John Gittelsohn and Nadja Brandt, *Stadium land seen as Dodgers key*, Bloomberg News/ArkansasOnline.com, Apr. 8, 2012, available at: <https://www.arkansasonline.com/news/2012/apr/08/stadium-land-seen-dodgers-key-20120408/> (discussing Guggenheim Partners’ 2012 acquisition of the Dodgers for \$2.15B, a record price for any sports team at the time; the article quotes UCLA economics professor Lee Ohanian that such a price “didn’t make sense,” and expected that revenue to justify such a high price would come from development of the land around Dodger Stadium.)
- Roger Vincent and Ken Bensinger, *Developing Chavez Ravine is likely in play for new Dodgers owner*, LA Times, Apr. 16, 2012, available at <https://www.latimes.com/sports/la-xpm-2012-apr-16-la-fi-dodgers-land-20120417-story.html> (noting numerous well-known real estate developers had made bids for the team, and the \$2.15B price suggested development in the parking lot development was likely, recalling that “[f]our years ago, McCourt proposed a \$500-million plan to ring the stadium with restaurants, shops and a Dodgers museum.”).

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<sup>35</sup> Presentation materials for the “LA Dodgers Stadium Next 50” still appear on architecture firm Johnson Fain’s website at <https://johnsonfain.com/projects/architecture/commercial/la-dodgers-stadium-next-50/> (last viewed, Jan. 11, 2023). Johnson Fain’s Next 50 web page includes visualizations and descriptions of stadium improvements as well as an “[u]rban plaza surrounded by administrative office buildings,” a Dodger museum, 20,000 square foot Dodger Store, café, two 8-level 900-car parking structures, and a “Top of Park plaza.” The plaza would be “located at the highest elevation on site [and] will feature breathtaking 360 degree views spanning the Downtown skyline and Santa Monica Bay, the Santa Monica and San Gabriel Mountains, and the Dodger Stadium diamond.”

- Adrian Glick Kudler, *Everyone Betting on Dodger Stadium Land Development*, Curbed Los Angeles, Apr. 17, 2012, available at: <https://la.curbed.com/2012/4/17/10379072/everyone-betting-on-dodger-stadium-land-development>.

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GO14-60

As discussed above, a letter submitted on behalf of Arts District Community Council of Los Angeles in February 2021 also provides Metro with substantial evidence of foreseeable development of the Dodger Stadium parking lots. (See Exhibit A, *supra* fn. 2.) The ADCCLA letter cites statements found on McCourt Global’s website (still present as recently as March 31, 2022), noting that McCourt Global’s “current real estate projects include...260 acres of land at Chavez Ravine in Los Angeles.” (See Exhibit B, *supra* fn. 3.) McCourt Global’s revised web page no longer mentions the 260 acres of Chavez Ravine as a “current real estate project.” It instead promotes the “Los Angeles Aerial Rapid Transit project” as “an opportunity for our organization to partner with community leaders and stakeholders to contribute to the region’s aggressive climate goals and promote sustainability through innovative, zero-emission mobility technology— all while improving mobility and access to Dodger Stadium.” (See Exhibit C, *supra* fn. 3.) But web archives show text on that page state, as recently as January 26, 2021:

McCourt currently co-owns 260 acres of land at Chavez Ravine in Los Angeles, the home of Dodgers Stadium. *Among other plans for the area*, McCourt will develop a cutting-edge aerial tramway from Los Angeles Union Station to Dodgers Stadium through its company, Aerial Rapid Transit Technologies. (McCourt Global, *Real Estate Overview*, Nov. 26, 2020, attached as part of Exhibit B, *supra* p. 3 fn. 3 (emphasis added).)

GO14-61

Metro’s choice to allow ARTT LLC to ignore Metro’s query as to development plans at Dodger Stadium during early negotiations between the two does not erase the objective reality that such development is reasonably foreseeable. The evidence is *manifest* that development of a portion of the Dodger Stadium parking lots is not only foreseeable but likely. The DEIR is fatally flawed for failing to consider, analyze, and explain the potentially significant environmental impacts that would result from this foreseeable development that will follow due to the Project. Under CEQA, deferring environmental review of foreseeable indirect environmental impacts and thus deferring any and all necessary mitigations associated with those impacts is impermissible. “While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can.” (CEQA Guidelines, § 15144.)

Most important, since reasonably foreseeable development at Dodger Stadium would be expected to draw many people to the Chavez Ravine site daily on non-game and non-special event days (and would also likely cause additional traffic and transportation issues on days with games and special events from drawing even more people than the approximately 56,000 fans that attend a sellout game at the stadium), the DEIR’s complete failure to consider and analyze impacts of such readily foreseeable development entirely undercuts major claims of Project benefits with respect to reduced energy usage, reduced greenhouse gas emissions, reduced vehicle miles traveled (VMT), and assertions regarding other standard environmental impact analysis categories.

GO14-62

In short, the Project’s environmental review process is made entirely invalid by the Draft EIR’s egregious failure to disclose, discuss, and evaluate the foreseeable development.

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GO14-62

Moreover, development of Dodger Stadium parking lots is not the only reasonably foreseeable use of the Project. The Project would also allow Dodger Stadium to be used as a “satellite lot” to allow people to drive to downtown Los Angeles in order to park at Dodger Stadium and use the private gondola to come down from Dodger Stadium to attend events in downtown Los Angeles sports and entertainment venues and to large events at LA State Historic Park. This injection of additional vehicles into the downtown area is also a reasonably foreseeable indirect environmental impact that is not discussed or analyzed in the DEIR.

For example, at a recent meeting of Metro’s Ad Hoc 2028 Olympics Committee, the board received a staff presentation explaining how Dodger Stadium parking area had been used as satellite parking for the MLS Cup Final, scheduled at 1pm on Nov. 5, 2022, hours before USC’s scheduled home football game at the Coliseum the same day.<sup>36</sup> The MLS Cup Final satellite parking utilized a private shuttle bus service which ran from 9 am to 6 pm. According to Metro, 500 car and 1,500 riders used this shuttle service. If the Project were constructed shuttle buses would not be necessary to move sports event attendees from Dodger Stadium to downtown sports venues, as patrons could use the ARTT LLC private gondola to gain access to Metro’s public transit system, whether via trains or bus lines. This foreseeable use of the Project would also draw vehicle traffic to Dodger Stadium that is not accounted for by the Draft EIR.

GO14-63

At the Ad Hoc meeting, public commenter Phyllis Ling noted: “It sounds like you are opening the door to people using Dodger Stadium parking lot as a park and ride lot. That would be – would that be the biggest park and ride lot in the nation? That’s a lot of additional Vehicle Miles Traveled into our neighborhood.” She also expressed that Metro should learn the lessons from the London and Rio Olympics, which had both built gondolas for their Olympics, and that had not worked out as long-term infrastructure choice for transportation. As Ling stated: “The Rio gondola ran out of money for maintenance and is no longer running. The London gondola has hardly any local riders, it is used mostly for tourism and needs taxpayer funding to support it.”<sup>37</sup> As discussed at length above, the federal definition for “public transportation” does *not* include services used for tourism or “sightseeing,” which is specifically excluded from consideration as “public transportation” under federal law. (49 U.S.C. § 5302, subd. (15)(B)(v).)

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<sup>36</sup> See excerpts from Metro Ad Hoc 2028 Olympics Committee Agenda – Final, Nov. 16, 2022, agenda item 6, “Mobility Lessons Learned from World Sports Events,” as well as p. 11 of a slide presentation presented at that meeting entitled “Major Events Lessons Learned,” attached as **Exhibit J**. Metro presents the audio and video of the Ad Hoc committee’s meeting audio/video on its media website: [https://metro.granicus.com/player/clip/2413?view\\_id=2&redirect=true&h=461b5c8f36092ebca0c1ed190e407b21](https://metro.granicus.com/player/clip/2413?view_id=2&redirect=true&h=461b5c8f36092ebca0c1ed190e407b21) (last viewed Jan 10, 2023). The agenda and related materials are also available at: <https://metro.legistar.com/MeetingDetail.aspx?ID=1005579&GUID=696A3208-D9CE-4B9E-8728-977FC65341C8&Options=&Search=> (last viewed Jan 10, 2023). The Metro Ad Hoc 2028 Olympics Committee meeting audio/video for this meeting *must* be made part of the Project’s administrative record.

<sup>37</sup> See link to audio/video, *supra* fn. 36.



The Ad Hoc 2028 Olympics Committee meeting presentation also included discussion of an event on October 28, 2018, known locally and nationally as the “Los Angeles Sports Equinox,” because games in every major US sports league occurred in Los Angeles on the same day: NFL (Rams), MLB (Dodgers), NBA (Clippers), NHL (Kings), and MLS (Galaxy). If the Project were built, expanded use of Dodger Stadium as a satellite (or park and ride) lot for similar high conflict sports and event days in downtown Los Angeles is a readily foreseeable physical change due to the project and would likewise be expected to draw significant vehicle traffic to Dodger Stadium, increasing greenhouse gas emissions and vehicle miles traveled.

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GO14-63

Ling’s public comment also expressed surprise that the private ARTT LLC gondola project had been placed on Metro’s “Comprehensive MCP Project List.”<sup>38</sup> Following the close of public comment, in response to Ling’s comment, Ad Hoc committee chair, Supervisor Hilda L. Solis questioned its inclusion on the list as well: “You know, just a quick question for staff—I don’t recall reading in my materials that the proposed gondola was a part of this. Is that correct?” Metro staff member Ernesto Chaves responded evasively: “It’s not part of the prioritized list that is coming up in the next item.” But Ms. Ling’s comment was not that it was placed on the *prioritized* list, it was that it was placed on the *comprehensive* list, which is correct.

The “lessons learned” presentation was followed by discussion of Metro’s “2028 Games Mobility Concept Plan.” As discussed above, the Project is included on Attachment C to that agenda item. (See fn. 38, this page.) The Project’s inclusion on Metro’s “Comprehensive MCP Project List” prepared for the Olympics must be construed as a formal acknowledgement *by Metro* that a reasonably foreseeable indirect physical change due to the Project is the use of Dodger Stadium parking lots as a satellite lot for Olympics event attendees. The presentation to Metro makes clear that even if Dodger Stadium is not an Olympic venue use of its parking lots for satellite lot use as in the recent MLS Cup Final is an available and perhaps desirable, more important reasonably *foreseeable*, option for many downtown sports venues where Olympic events *will* be held.<sup>39</sup> As discussed above, this foreseeable use would draw additional vehicle traffic to Dodger Stadium to utilize the private gondola, which would increase greenhouse gas emissions and vehicle miles traveled, among other potentially significant impacts, thus calling into significant question the DEIR’s GHG, VMT, and other conclusions. The DEIR does not address this foreseeable indirect physical change or its potential impacts.

GO14-64

Finally, the DEIR discusses that attendees at periodic special events at LA State Historic Park could take the private Project from LA Union Station to the proposed Chinatown/State Park Station, instead of existing *public* transit options. The DEIR assumes without substantial evidence that it would “capture” 10 percent of such riders. (DEIR, p. 3.17-26.) But the DEIR seems to assume that LASHP special event attendees will come only from the Union Station

GO14-65

<sup>38</sup> See Comprehensive MCP Project List, p. 5, attached as **Exhibit K**. The list is Attachment C to agenda item 7 on the Ad Hoc 2028 Olympics Committee Nov. 16, 2022 agenda; see Exhibit J, *supra* fn. 36. It is available at <http://metro.legistar.com/gateway.aspx?M=F&ID=b8e94467-6e56-4687-b2bc-3d0bb08fb2fa.pdf>.

<sup>39</sup> See Metro presentation, Motion 42 Update: 2022 Prioritized MCP Project List, Nov. 16, 2022, p. 3 (showing a map and list of downtown Los Angeles venues), attached as **Exhibit L**.

terminus of the Project. It does not discuss or analyze the foreseeable use of the Project to allow Dodger Stadium parking lots as a potential satellite lot for LA State Historic Park special events which, like other foreseeable uses that would use the Dodger Stadium parking lots for a park and ride or satellite use, would draw additional vehicle traffic to the local community, increasing greenhouse gas emissions and vehicle miles traveled, among other environmental impacts.

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GO14-65

Metro’s inexplicable failure to disclose, discuss, and analyze the above foreseeable indirect environmental impacts of the Project cannot be corrected merely by adding additional information in the Final EIR. The purpose of an EIR is to provide the public with detailed information about a project *before* it is approved (Pub. Res. Code, §§ 21002.1, 21003.1) “[W]hen significant new information is added to the EIR after public notice...but before certification, the EIR must be recirculated...” (Pub. Res. Code, § 21092.1; CEQA Guidelines, § 15088.5). The Draft EIR for the Project *must* be revised and recirculated to address the many deficiencies described in this and other comment letters so that the public has an opportunity to review and provide meaningful comment. Recirculation is required when a DEIR is “so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless.” (*Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1130.)

GO14-66

The DEIR’s analyses in numerous impact categories is clearly incomplete and deficient for its failure to consider potentially significant impacts of the foreseeable indirect physical change in the environment caused by likely future development at the Dodger Stadium parking lots or use of the lots as satellite for downtown Los Angeles events. These include the Project’s analysis of Air Quality, Energy, Geology and Soils, Land Use and Planning, Noise, Public Services, Parks and Recreation, Transportation and Traffic, and Utilities and Service Systems, among others. Conclusions about greenhouse gas (GHG) emissions and vehicle miles traveled (VMT) are particularly suspect.

GO14-67

In addition, the failure to consider foreseeable indirect impacts completely invalidates the DEIR’s Cumulative Impact and Growth-Inducing Impact Analyses. As the DEIR acknowledges: “Secondary effects of growth could result in significant, adverse environmental impacts, which could include increased demand on community public services, increased traffic and noise, degradation of air and water quality, and conversion of agricultural land and open space to developed uses.” (DEIR, p. 5-57.)

GO14-68

Metro has failed to make “a good faith effort at full disclosure” of the Project’s environmental effects. (See *California Oak Foundation*, 188 Cal.App.4th at 262.) The entire DEIR is rendered invalid for its failure to address any impacts from the foreseeable indirect physical changes to the environment likely to be caused due to the proposed Project and must revise and recirculate the DEIR. In the alternative, Metro could instead deny the Project outright. This is the most appropriate course of action since there are superior feasible alternatives that would reduce the Project’s significant (and unavoidable) adverse environmental impacts. (See Pub. Res. Code, § 21002: “[P]ublic agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects....”)

GO14-69

## II. SUBSTANTIVE COMMENTS ON IMPACT ANALYSES

The following comments are generally presented in the order addressed in the Draft EIR.

### A. The Executive Summary is Incomplete and Inaccurate.

Note that some comments associated with the Executive Summary will be made within specific DEIR analysis sections following this section.

#### 1. CEQA requires the City of Los Angeles to serve as Lead Agency.

As discussed at length in this office’s letter on behalf of LA Parks Alliance of December 19, 2022, LA Park’s Alliance objects to Metro’s negotiated arrangement to serve as lead agency for the Project. (DEIR, p. ES-1.) The Executive Summary’s conclusory analysis that Metro is “the public agency with the greatest responsibility for supervising or approving the project is a whole” is grossly in error. Metro has not documented that it has performed the mandatory analysis pursuant to CEQA Guidelines section 15051 to determine the appropriate lead agency. Had the proper analysis been done, plainly the City of Los Angeles would be designated as the lead agency, not Metro.

Metro’s errant conclusion is presented as a *fait accompli*. This is confusing and misleading to the public (and perhaps also to some agency decisionmakers), most of whom are unlikely to understand that the determination of lead agency must follow the CEQA guidelines. If the CEQA Guidelines were followed the City of Los Angeles would be designated as lead agency, not Metro, for all the reasons discussed in the letter of December 19, 2022.

Designation of the incorrect lead agency prejudicially taints the EIR process, a fatal flaw that can only be remedied by beginning the environmental review process anew with the correct lead agency, here the City of Los Angeles. (See *Planning & Conservation League v. Department of Water Resources* (2000) 83 Cal.App.4th 892, 907.)

#### 2. The number of Dodger Stadium parking spaces to be removed is not included in the DEIR.

The Executive Summary notes that “[i]mplementation of the Dodger Stadium Station would require the removal of parking spaces,” but nowhere does the DEIR detail the number of spaces permanently lost at the stadium due to implementation of the Project. (DEIR, p. ES-10; see also, DEIR, p. 2-39.) The DEIR is incomplete in not including this information.

#### 3. Claims of reduced GHG emissions and reduced VMT do not consider reasonably foreseeable indirect physical changes in the environment due to the Project.

The DEIR explains in the Executive Summary and repeats many times throughout that “the proposed Project would reduce vehicle miles traveled (VMT) and congestion, leading to

GO14-70

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GO14-72

GO14-73

reduced GHG emissions and improved air quality.” (DEIR, p. ES-13.) But as discussed above, the DEIR does not consider reasonably foreseeable indirect physical changes in the environment due to the Project, such as development of Dodger Stadium parking lots, or use of those lots as a satellite or “park and ride” lot, which would likely draw many thousands of cars to Dodger Stadium. Thus, all DEIR conclusions regarding GHG, VMT, and many other analysis categories are incomplete and inaccurate and cannot be relied upon.

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GO14-73

**4. The Executive Summary’s “Summary of Public Comments” glosses over neutral and negative comments received during the scoping process.**

The Executive Summary’s “Summary of Public Comments” improperly mischaracterizes the public comments received during the Project’s scoping process by minimizing all negative and neutral comments received. (DEIR, p. ES-17.) The Executive Summary describes the numerous mixed comments in one sentence: “Many community members expressed conditional support for the proposed Project with a strong interest in future Project developments.” (*Ibid.*) This comment seems intended to dissuade DEIR reviewers from bothering to review Appendix A, which includes hundreds of pages of comments, including not only positive and conditionally supportive, but also negative and neutral comments that would likely have informed additional public comment on the DEIR.

GO14-74

California’s Supreme Court has held that the environmental review process is intended “to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.” (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 392.) “[B]efore project approval, the law presumes the lead agency is neutral and objective and that its interest is in compliance with CEQA. ... The agency’s unbiased evaluation of the environmental impacts of the applicant’s proposal is the bedrock on which the rest of the CEQA process is based.” (*Golden Door Properties, LLC v. Superior Court* (2020) 53 Cal.App.5th 733, 782.)

Metro falls far short of CEQA’s goals of transparency, full disclosure, and lack of bias when it grossly mischaracterizes public comments received during the scoping process and uses the DEIR as an advocacy document rather than a neutral, unbiased evaluation of the Project. Because the DEIR must be revised and recirculated (if not entirely discarded) due to its numerous fatal flaws, LA Parks Alliance urges Metro to take the opportunity to remove misleading statements that mischaracterize public comment received in any later environmental review document prepared for the Project.

**5. The Executive Summary’s list of significant and unavoidable impacts is incomplete and inaccurate.**

As discussed above, while the California Department of Parks and Recreation clearly has jurisdiction over LA State Historic Park, neither the Department nor the Director have unbridled authority to permit changes to state parkland that would result in a violation of state law. Since the Project may not use any portion of LA State Historic Park for all of the reasons discussed in Parts I(D) and I(E) of this letter (see pp. 12-25), the Executive Summary is incomplete and

GO14-75

inadequate for failing to identify that impacts to LA State Historic Park are significant and unavoidable.

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GO14-75

**B. The DEIR’s Introduction is Incomplete and Inaccurate.**

**1. The DEIR fails to identify all trustee and responsible agencies.**

As discussed above, Metro failed to include at least two state agencies as trustee and/or responsible agencies. (See Part. I.B., *supra* pp. 3-7.) As a result, DEIR section 1.3 is incomplete and inaccurate for failing to identify the Santa Monica Mountains Conservancy and California Department of Housing and Community Development. (DEIR, p. 1-2.)

GO14-76

**2. The DEIR misidentifies the Project as eligible for SB 44.**

The DEIR’s SB 44 analysis of the Project concludes that it is eligible for SB 44 streamlining as an environmental leadership transit project. (DEIR, pp. 1-4 to 1-9). However, this conclusion is incorrect for all the reasons discussed above (primarily because the project is not “public transportation” and therefore cannot be considered a “fixed guideway”). (See Part I.C., pp. 8-12.) In addition to objections already raised, the DEIR’s SB 44 analysis is also vague, inaccurate, and misleading.

GO14-77

First, although the Project is only 1.2 miles in length (DEIR, p. ES-1), the DEIR states: “For the purposes of SB 44, this Draft EIR defines the ‘corridor of the project’ as the area in which Dodger fans travel to and from games at Dodger Stadium, based on existing ticket sale data.” (DEIR, p. 1-4.) The DEIR is vague and ambiguous in not explaining why the “corridor of the project” is so much greater than the actual project area and suggests that the Project takes credit for GHG and VMT reductions not associated with the Project. The response to DEIR comments should explain why the “corridor of the project” can be so vast when compared to the small actual corridor the proposed Project would occupy if constructed.

As discussed above, the DEIR’s calculation of GHG and VMT reductions do not include consideration of reasonably foreseeable indirect physical changes in the environment (foreseeable development at Dodger Stadium parking lots as well as use of the lots for satellite parking), and therefore information provided in support of the DEIR’s SB 44 analysis of GHG and VMT is inaccurate and must be recalculated. (See DEIR, pp. 1-5 to 1-6, 1-8.) This claim is made repeatedly throughout the DEIR.

GO14-78

The DEIR’s consistency analysis with the Goals of Connect SoCal is inaccurate. For example, the second goal is met in part “by reducing passenger vehicle miles traveled.” (DEIR, p. 1-6.) As discussed above, the VMT calculations are incorrect due to the DEIR’s failure to consider reasonably foreseeable indirect physical changes in the environment due to the Project. Likewise, the fifth and seventh goals are met in part by assuming a reduction in net GHG due to the Project, which is also calculated without considering reasonably foreseeable indirect physical changes in the environment due the Project. (DEIR, pp. 1-6, 1-7.) The Project meets the sixth

GO14-79

goal by relying on an entirely speculative “*potential* mobility hub” at Dodger Stadium, which would allegedly increase access to Elysian Park and surrounding communities. (DEIR, p. 1-7.)

The DEIR’s analysis of consistency with the eighth listed goal states that it would “leverage new transportation technologies and data-driven solutions that result in more efficient travel.” (*Ibid.*) There is no evidence presented in the DEIR to support this pie-in-the-sky consistency conclusion—the conclusory statement is no more than unabashed cheerleading in support of the Project.

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GO14-79

The DEIR’s analysis of consistency with Connect SoCal’s ninth goal suggests that the Project will encourage housing growth. (*Ibid.*: “The proposed Project would encourage development of diverse housing types.”) While LA Parks Alliance believes this statement is likely *true*, since the DEIR fails to consider the growth-inducing impacts of the reasonably foreseeable indirect physical changes to the environment due to the failure to address future development at Dodger Stadium (which could not only *include* housing, but also would likely increase the number of permanent jobs in the region, which would induce housing demand), it is completely at odds with the DEIR’s later conclusion that the Project will not promote any growth in housing, whether directly or indirectly. (DEIR, p. 5-58.) The Project cannot both *encourage* housing while not directly or indirectly inducing growth. Metro needs to explain this internal inconsistency.

GO14-80

The DEIR’s analysis of consistency with the tenth and final Connect SoCal goal states that the Project “would promote conservation of natural and agricultural lands and restoration of habitats by being constructed in a previously developed area, and would not impede the region’s goal of conserving land and restoring habitats.” (DEIR, p. 1-7.) This is an outrageous conclusion given that the Project seeks to use well over an acre of the Los Angeles State Historic Park for a significant portion of its alignment and would require 81 trees in and adjacent to the Park to be destroyed. On this basis alone, it is evident that the Project does not “promote conservation of natural...lands and restoration of habitats.” Further, and as discussed below, removal of 81 trees and Project-related activity at the western side of the Park removes habitat, and the Project’s gondola cable system will likely result in deadly bird strikes. These significant impacts do not “promote conservation.”

GO14-81

**C. The Project Description Minimizes Project Impacts, Includes Artificially Constrained Project Objectives, and is Inaccurate, Incomplete and Misleading.**

**1. The project description of Los Angeles State Historic Park minimizes aesthetic, cultural, historic, and other Project impacts.**

GO14-82

The DEIR provides general descriptions of major landmarks within the alignment of the proposed Project. Section 2.3.4 of the DEIR’s Project Description provides information about Los Angeles State Historic Park. The bland description of LA State Historic Park greatly undervalues its importance as a treasured resource within both the local community it serves and to the people of California more generally.

LA State Historic Park’s name was specifically chosen “in an effort to support the broad interpretive purpose of the Park in *telling the whole cultural story of Los Angeles.*” (LASHP General Plan, p. 10 (emphasis added).)<sup>40</sup> As LA State Historic Park’s General Plan states:

Who are Angelenos? What is Los Angeles? As noted historian Dr. Leonard Pitt stated, “No other available 32 acres holds as much opportunity to enlighten us about the history and culture of Los Angeles and this region...” The Park site and its surroundings have a sense of place rooted in a long history of settlement. There are opportunities for discovery and revelation based on the untold stories, some contained in the remnant material culture of the site. The tangible resources today appear to be few, but we can still hear the whispers of the past resonating in the voices of the present, proclaiming the future of the area. ... [¶]

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GO14-82

The site has been the crossroads and hub for many peoples in the past and is still in a transportation corridor that is connected to the larger region by rail, the nearby river, and major thoroughfares. It has been the scene of discovery, adventure, and tragedy. Struggles and triumphs were part of the changing landscape of the people passing through, moving in, moving out, forced out, and returning. It is the core of a town that grew to a megalopolis with global influence that was, and still is, often veiled in myth and controversy.

On the other hand, the Park is nestled into the heart of Los Angeles’ urban core surrounded by clusters or pockets of identifiable neighborhoods and communities that have long rooted connections to the history of the city. While intimately connected to the surrounding dense urban development, the open space of the 32 acres of this site will be able to provide escape from the structure and pace of urban life.

(LASHP General Plan, pdf. p. 9 (“Sense of Place”).)

One of LA State Historic Park’s major features, identified by its General Plan as an “aesthetic resource,” is its iconic view of the City of Los Angeles. (*Id.*, p. 38.) “As viewed from the north, especially from the northern two-thirds of the property, the Park site is a large open space that is in stark contrast to the dramatic skyline of downtown Los Angeles. Sometimes referred to as the ‘front porch’ of the City, *there are no other sites that capture this welcoming view of downtown Los Angeles.*” (*Ibid.* (emphasis added).)

GO14-83

LA State Historic Park’s General Plan’s Final EIR includes Mitigation Measure Aes-1 to protect this “front porch” view of the Los Angeles skyline. It requires that those necessary facilities to be constructed at LA State Historic Park “[i]mplement design practices that reduce the overall negative aesthetic effect of new facilities.” (*Id.*, p. 122.) These design practices include use of vegetation to screen negative views, incorporating architectural site/design

FN GO14-82 <sup>40</sup> California Department of Parks and Recreation, Los Angeles State Historic Park General Plan and Final Environmental Impact Report (hereafter “LASHP General Plan”), 2005, available at: <https://www.parks.ca.gov/pages/21299/files/LASHP%20General%20Plan-EIR.pdf>.

elements consistent with the plan, limit and direct lighting downward, and evaluating the location of structures to enhance positive views *from* and *of* the Park. (*Ibid.*)

The DEIR description of the iconic “front porch” viewshed states only that “[v]iews of downtown Los Angeles are available from the majority of the site.” This bland description seems calculated to minimize the importance of protected views of downtown Los Angeles from LA State Historic Park, and to set the table for later minimization of the Project’s significant aesthetic impacts on the Park, which are discussed further below.

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GO14-83

## 2. The project description of Dodger Stadium is incomplete.

The DEIR’s one-paragraph description of Dodger Stadium is accurate, but incomplete.

The DEIR’s description of Los Angeles Union Station explains the LA Union Station Master Plan “encompasses approximately 38-acres” [sic]. (DEIR, p. 2-7.) The DEIR’s description of El Pueblo de Los Angeles notes that its Historic District has an area of approximately 9.5 acres. (DEIR, p. 2-8.) The DEIR’s description of Los Angeles State Historic Park states that it “comprises 32 acres of open space.” (DEIR, p. 2-9.)

GO14-84

The DEIR’s description of Dodger Stadium notes the date it opened, its street address, where it is located, its seating capacity, its location relative to local freeways, and the neighborhoods located around it.

But the DEIR does *not* mention that Dodger Stadium is surrounded by 260 acres of parking lots. This is a curious omission, given that one of the DEIR’s fatal flaws is its failure to discuss or analyze the reasonably foreseeable indirect physical change in the environment likely to occur due to the Project: the development of some portion of the 260 acres of parking lots surrounding the stadium. (See discussion Part I(G), *supra* pp. 26-34.)

## 3. The Project Purpose and Need section is incomplete and misleading.

The DEIR includes a brief discussion describing the need and alleged purpose of the Project. (DEIR, pp. 2-10 to 2-12.) It explains that with the potential ability to move 10,000 people within two hours prior to the start or after a game or event at Dodger Stadium, and with average Dodger Game attendance of approximately 49,000 people, the private gondola could transport approximately 20,000 fans to Dodger Stadium. (DEIR, p. 2-12.) This assertion suggests that the gondola would operate at essentially maximum capacity right out of the gate.

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But the question is not how many people *could* use the gondola, it is how many *would*.

The DEIR states that if immediately constructed and operational in 2026, the initial average ridership to attend Dodge Games would only be 6,000 fans. (DEIR, pp. 3.17-34 to 3.17-35.) The Project Description is thus very misleading, grossly overstating the initial Dodger Stadium game ridership as potentially more than even the DEIR claims—not approximately 20%



of fans, but approximately 12% (that is, if the many DEIR assumptions regarding ridership are accurate).

Moreover, the DEIR's ridership assumptions are that 100% of gondola users will use it both for arriving to *and departing from* Dodger Stadium. (DEIR, p. 3.17-24). But there is no chance this unsupported assumption is correct. A healthy person could walk from Dodger Stadium to Union Station in far less than the two hours it would take to transport 10,000 fans there. According to the Google Maps direction tool, a walk from Dodger Stadium to Union Station (which is flat or downhill the entire way), would take 35-37 minutes, depending on the precise route chosen.<sup>41</sup> The DEIR estimates that 15% of riders would transfer from the Metro Gold line at its Chinatown Station. (DEIR, p. 3.17-24.) This is a considerably shorter walk from Dodger Stadium than to Union Station, only 1.2 miles, and would take only 25 minutes.<sup>42</sup>

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GO14-85

For those who would not choose to wait for their turn in a post-game gondola line who cannot or prefer not to walk to the nearest Gold Line station or to Union Station, many would likely use another available alternative than stand and wait for an hour or more. Other options include a rideshare service such as Uber or Lyft, the Dodger Stadium Express bus (assuming it is still in operation), or a shorter walk to an intermediate location, for example Sunset Boulevard, to take a rideshare vehicle or other public transportation from there.

As Metro's precursor agency (Los Angeles County Transportation Commission) learned from the August 1990 Gruen Associates report, a gondola tramway alternative offers the lowest capacity of typically available people mover technologies, and therefore the greatest waiting times compared to other technology options.<sup>43</sup> Metro seems to have forgotten the earlier study. While the 1990 gondola option was a slightly different technology and route than the currently proposed Project, its conclusions comparing the relative waiting time among people moving technologies remains valid. The LACTC Study amplifies two important points ignored by the Project's DEIR:

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- Gondola boarding wait times far exceed wait times for other options
- Proper transportation planning requires consideration of not only the time it takes for the technology to deliver passengers from one point to another, but the *total amount of time* spent waiting/boarding and traveling.<sup>44</sup>

<sup>41</sup> **Exhibit M** is a Google Map page created January 9, 2023, showing two walking routes from Dodger Stadium to LA Union Station, both of approximately 1.8 miles, estimated to take between 35-37 minutes.

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<sup>42</sup> **Exhibit N** is a Google Map page created January 9, 2023, showing walking routes from Dodger Stadium to the Metro Gold line Chinatown Station, the shortest of which is 1.2 miles, estimated to take approximately 25 minutes.

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<sup>43</sup> Gruen Associates, Dodger Stadium Transit Access Study prepared for the Los Angeles County Transportation Committee (hereafter LACTC Study), Aug. 1990, pp. iii-iv, attached as **Exhibit O**.

<sup>44</sup> See LACTC Study, *supra* fn. 43, p. 30.

As the LACTC Study notes, “[a]ny transit technology must accommodate a peak loading phenomenon where up to 56,000 persons enter or leave [Dodger] Stadium within a brief period of time before or after events.” (LACTC Study, p. iii.) But the DEIR *never* discusses the total time between Union Station and Dodger Stadium including both waiting and travel time. It only ever discusses the brief travel time. (See, e.g., DEIR, pp. ES-1, ES-3, 1-1, 2-1, 2-12, 2-42, 3.11-54, 3.11-55, 5-59.) The DEIR discusses queueing *areas*, but not queueing *times*. 10,000 patrons cannot all occupy one 30-40 passenger gondola cabin. At a rate of only 5,000 passengers per hour, if the gondola is as popular as projected (and no substantial evidence supports that it will be) the last gondola would leave Dodger Stadium approximately two hours after conclusion of a game or special event. The DEIR assumes 100% round trips (DEIR, p. 3.17-24) but fails to consider that not all patrons will be willing to wait that long. The LACTC Study, completed more than 30 years ago, did not make this fundamental error.

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GO14-86

Also entirely missing from the project description’s statement on the proposed Project’s alleged purpose and need is any discussion of future development at Dodger Stadium. As discussed at length above, public reporting on potential development of the Dodger Stadium parking lots has been in the public realm for well over a decade, and was noted repeatedly during the Project’s scoping process, yet is entirely ignored in the project description’s discussion of the Project’s purpose. (See discussion, *supra* pp. 26-33.) The effort to remove vehicles from local roadways is not likely to be significant (see UCLA Mobility Lab study, *infra* fn. 46). But removal of a significant number of vehicles from Dodger Stadium parking lots is likely to free up space in those parking lots for the foreseeable development described in the many articles attached to this comment letter. (See Exhibit I, *supra* fn. 34.)

GO14-87

The Project Description’s purpose and need section is misleading and incomplete. It omits the expected travel time between Union Station and Dodger Stadium, leaving out the very lengthy expected wait times for passengers who would use it to attend Dodger games and events, and assuming all passengers would both arrive and depart via the private gondola, as opposed to arriving via the gondola and departing by some other means. And it fails to acknowledge that the alleged goal of removing passenger vehicles from local roadways would also coincidentally remove them from the Dodger Stadium parking lot, freeing up some portion of those lots for long-planned development as earlier described.

#### **4. The Project Objectives are artificially constrained to favor the preferred project alternative.**

An EIR’s project description must contain a “statement of the objectives sought by the proposed project.” (CEQA Guidelines, § 15124 subd. (b).) The purpose of providing a statement of objectives is to “help the lead agency develop a reasonable range of alternatives to evaluate in the EIR” and to “aid the decision makers in preparing findings or a statement of overriding considerations, if necessary.” (*Ibid.*; see also CEQA Guidelines, § 15126.6(c): “The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of

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the significant effects.”) An EIR’s alternatives section, informed by the statement of objectives, is part of the very “core of the EIR.” (*In re Bay-Delta etc.* (2008) 43 Cal.4th 1143, 1162.)

Project objectives may not define a project so narrowly “as to preclude any alternative other than the Project.” (*We Advocate Thorough Environmental Review v. County of Siskiyou* (hereafter *WATER*) (2022) 78 Cal.App.5th 683, 692.) “[I]f the principal project objective is simply pursuing the proposed project, then no alternative other than the proposed project would do. All competing reasonable alternatives would simply be defined out of consideration.” (*Ibid.*) The statement of project objectives for the proposed Project charts just such an unlawful course.

The project objectives start with a recitation of the Project’s overall purpose, which has at least three or four separate “overall” purposes embedded within it:

The overall purpose of the proposed Project is to provide a direct transit connection between LAUS and the Dodger Stadium property via an aerial gondola system and improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the neighborhoods along the proposed alignment and the region’s rapidly growing regional transit system at LAUS.  
(DEIR, p. 2-12.)

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Here, a reasonable and sensible “overall” purpose could very well be providing a direct transit connection between LAUS and the Dodger Stadium property. That is but *one* overall purpose. Must that overall purpose limit feasible projects to those that are “an aerial gondola system?” Must it also “improve connectivity for the surrounding communities by linking to the Los Angeles State Historic Park,” or is that merely a clever rationale to justify taking well over an acre of LA State Historic Park for a commercial, private transit system?

The list of bullet-pointed project objectives that follow the DEIR’s initial “overall purpose” statement includes several impermissible objectives that are plainly intended to define out of consideration competing reasonable alternatives, limiting the number of reasonable alternatives considered. (See *WATER*, 78 Cal.App.5th at 692.) These include (objectionable wording is emphasized with *italicization*, with some parenthetical commentary):

- Attract new transit riders to the Metro system through a *unique experience of an aerial transit system* connecting to Dodger Stadium. (Attracting new Metro riders through a Dodger Stadium connection need not be via aerial transit—this objective unnecessarily precludes feasible alternatives.)
- Improve the Dodger Stadium visitor experience by providing *efficient, high-capacity, and faster alternative* access to Dodger Stadium. (Since the DEIR fails to include data on queueing times, it is unclear whether the preferred alternative meets this objective.)
- Enhance safety of neighborhoods adjacent to Dodger Stadium by reducing the number of vehicles in the area. (Based on a report prepared for the Project

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proponent, many gondola users are likely to drive downtown to take the gondola, and others are likely to use rideshare services before and/or following the game.<sup>45</sup> It is thus unclear how well the preferred alternative meets this project objective, if at all.)

- Reduce transportation related pollution and greenhouse gas (GHG) emissions as a result of reduced vehicular congestion in and around Dodger Stadium, on neighborhood streets, arterial roadways, and freeways during game and special event days. (See preceding comment—it is unclear how well the preferred alternative meets this project objective; foreseeable indirect physical changes due to the preferred alternative would also draw additional vehicles to the Project area not considered.)
- Improve transit rider experience *by providing unique scenic views of the Los Angeles area to ART passengers and Dodger fans*. (This objective unnecessarily precludes feasible alternatives.)
- *Bring a world class aerial transit system to the Los Angeles area*. (This objective unnecessarily precludes feasible alternatives.)
- Enhance community connectivity by providing first/last mile transit and pedestrian access to areas that have historically been underserved, *including the Los Angeles State Historic Park and Elysian Park*. (This objective is an attempt to justify use of public parkland for the benefit of the Project, which is impermissible under California law. See discussion, *supra* pp. 12-26.)
- Identify comparable, affordable, and accessible fare opportunities for community and *Los Angeles State Historic Park and Elysian Park* access. (See preceding comment. LA State Historic Park is already well-served by public transit.)
- *Minimize the Project's environmental footprint* through the integration of sustainability and environmentally-friendly design features into the materials, construction, operations, and maintenance of the proposed Project. (Building a project out of sustainable materials does not minimize its aesthetic, cultural, historic, and other significant impacts. This project objective is far better met by the environmentally superior alternative, which requires little, if any, permanent infrastructure to be built along the Project's 1.2 mile long corridor, and has no meaningful aesthetic, cultural, historic, or other impacts.)
- Provide a sustainable form of transit *by operating the ART system* with the use of zero emission electricity with battery storage backup in order to reduce GHG emissions and improve air quality. (The objective assumes an aerial

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<sup>45</sup> See Fehr & Peers, Los Angeles Aerial Rapid Transit Project–Parking Study (Sept. 2022 Draft), pp. 8-9. This document is already part of the administrative record for the Project, and is available at: [https://www.dropbox.com/sh/trfpt09to0kp4a8/AACpn7RaYP9KN2zG7ncfAYt6a/Documents/LA%20ART%20Parking%20Study?dl=0&subfolder\\_nav\\_tracking=1](https://www.dropbox.com/sh/trfpt09to0kp4a8/AACpn7RaYP9KN2zG7ncfAYt6a/Documents/LA%20ART%20Parking%20Study?dl=0&subfolder_nav_tracking=1).

rapid transit (ART) system, which unnecessarily precludes feasible project alternatives.)

- Maximize the Project’s alignment along the public ROW and *publicly owned property* and *minimize aerial rights requirements* over private properties, taking into account existing and future adjacent land uses. (The objective assumes an aerial rapid transit system, which unnecessarily precludes feasible project alternatives, and fails to distinguish between publicly owned property that is and is not preserved as public parkland.)

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The above parenthetical objections illustrate how a substantial number of project alternatives are unnecessarily precluded by the DEIR’s artificially narrow project objectives, which were plainly crafted to favor the preferred alternative aerial rapid transit system over other feasible alternatives to transport Metro riders from LA Union Station to Dodger Stadium with a stop at (within) LA State Historic Park to attempt to justify use of public parkland for the benefit of the Project.<sup>46</sup> It is improper to take an artificially narrow approach in crafting project objectives to ensure that the results of an alternatives analysis is only “an empty formality.” (*WATER*, 78 Cal.App.5th at 692.)

LA Parks Alliance notes that it is the *lead agency*, not the project proponent, that is responsible for a project’s environmental document. (Pub. Res. Code, § 21067; CEQA Guidelines, § 15050.) The proposed project objectives provided here *by Metro* suggests a strong precommitment to the proponent’s preferred aerial tram alternative. (See *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116, 138-139: an agency must not commit itself to particular project features “so as to effectively preclude any alternatives or mitigation measures that CEQA would otherwise require to be considered...”; see also CEQA Guidelines, 15126.6, subd. (e).)

GO14-90

The DEIR’s project objectives have been artificially narrowed to favor an aerial tram alternative and should be re-crafted so as not to unnecessarily preclude other alternatives that feasibly attain most of the basic objectives of the project (focused on moving passengers from Union Station, and perhaps other locations, to Dodger Stadium) and avoid or substantially lessen the significant effects of the Project.

GO14-91

**5. The Project alignment diagrams provide insufficient detail.**

Illustrations of the proposed Project alignment found in the DEIR’s project description are insufficient to allow interested members of the public to evaluate the alignment. Figure 2-7 (entitled “ANSI Requirements and Additional Separation Buffer”) and Figure 2-8 (entitled “Proposed Alignment Over Public ROW/Publicly-Owned Property and Private Property”) each

GO14-92

<sup>46</sup> If the fundamental Project goal were to remove passenger vehicles from local roadways, there would be no proposed intermediate Chinatown/State Park Station, which encourages parking on local streets in Chinatown and at and near LA State Historic Park. Instead, gondola passengers could take the Gold Line one stop to Union Station and queue for the gondola at its Union Station terminus. This alternative is not studied in the DEIR, perhaps because with no justification for use of LA State Historic Park’s airspace, the preferred alternative is actually not feasible.

use one page to show the entire Project alignment. (DEIR, pp. 2-20 to 2-21.) While they provide a generalized view of the proposed Project location, zooming in does not provide interested community members (or decisionmakers) sufficient detail to understand the alignment’s proximity to nearby buildings and other structures.

Figure 2-8 does not distinguish between types of publicly owned property—showing all publicly owned property in one color, whether public right-of-way or public parkland.

Referenced images found in Appendix Q are more detailed, but still provide insufficient information, and are also quite large file sizes. Metro should not presume that all members of the public have adequate computer technology at their disposal to enlarge the images by “zooming in” to study these images. Rather than providing one electronic image that may be zoomed in, the DEIR should instead (or in addition) provide an enlarged representation of both Figures 2-7 and 2-8, as well as each page found in Appendix Q, on a mapped series of images so that all interested members of the public, including those who need to view the document in hard copy as well as those who have computer access but cannot readily manipulate large files, have an opportunity to review and comment on concerns regarding the Project alignment after having reviewed adequately sized images.

The Project alignment illustrations also do not provide adequate information about the so-called “Additional Separation Buffer.” (See discussion, *supra* p. 12.)

## 6. Project Ridership is based on speculation, not substantial evidence.

The project description describes ridership estimates for the Project. “During peak operations, the proposed Project would carry up to approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes.” (DEIR, p. 2-42.) As discussed above, the Project Description misleadingly focuses not on the total time it would take to be transported from Union Station to Dodger Stadium via the Project including the wait or queueing time, but only on the travel time. In addition, the project description’s focus on alleged 2042 estimates of 5,000 people per hour per direction misleads a DEIR reviewer who may not delve further into the details. The 2026 estimated hourly users are only 3,000 per hour. (DEIR, pp. 3.17-34 to 3.17-35.)

The estimate of people allegedly moving through the system per hour also depends entirely on the configuration of gondola cabins. The DEIR discloses that gondola cabins can be configured to carry between 30 to 40 people. (DEIR, pp. ES-3, 2-2, 2-18.) A survey of the DEIR, including Appendix N (which includes discussion of the gondola ridership model), discloses that there is no discussion whether cabins will be configured to carry 30 people or 40 people, or some other number, or whether there would be a mix of cabin configurations. The number of passengers moved per hour if each cabin has 40 people is obviously significantly greater than the number that can be moved if each cabin only has 30 people.

For example, assuming the gondola system were able to operate perfectly with a 23-second headway that is never interrupted by any delay due a technical issue or passenger loading

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GO14-96

problem, the Project would move 156.5 cabins per hour. (60 minutes x 60 seconds ÷ 23 ≈ 156.5.) This number of cabins configured to hold 30 passengers can thus move 4,695 passengers per hour. (156.5 x 30 = 4,695.) Cabins configured to hold 40 passengers can move as many as 6,260, or 33% more passengers per hour. (156.5 x 40 = 6,260). The actual cabin configuration, which the DEIR does not explain, matters a lot. These are maximal projections, assuming there is *never* a breakdown, *never* a passenger loading or other problem, and *all* cabins are *always* full.

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GO14-96

Moreover, the Dodger Game Project ridership estimates are based on an untested model created specifically for the Project. (DEIR, Appx. N, pdf p. 6 (Fehr & Peers, Ridershop Model Development report, Sept. 2022).) The model inexplicably seems to use data from only two zip codes for inputs, one very near Dodger Stadium (90012, 0.6 miles away) and one in South Los Angeles relatively far from Dodger Stadium (90044, 10 miles away) to model estimated Project ridership. (*Ibid.* pdf pp. 9-12 (Table 1: Model Inputs and Data Sources).) It is inappropriate to extrapolate from such a small amount of data to model Los Angeles’s complex transportation system. (Moreover, for nearby 90012 patrons only 0.6 miles away, why would they *ever* wait in line for up to two hours to return home when they could walk in ten to fifteen minutes?)

A far more reliable transportation analysis was performed by the UCLA Mobility Lab to assess claims made by the Project proponent that it would have up to 10,000 riders per Dodger Game, thereby removing up to 3,000 vehicles from Los Angeles streets:<sup>47</sup>

The UCLA researchers — led by Dr. Brian Yueshuai He and Dr. Jiaqi Ma in the UCLA Mobility Lab at the UCLA Samueli School of Engineering — used the “LA Sim” model they created based on activity-based travel demand and agent-based simulation models. The model is *grounded in the theory of “discrete choice,” for which Daniel F. McFadden won a Nobel Prize in economics in 2000. Based on real data* about road network, traffic, public transportation, and other modes of moving around the city, including walking and bicycling, LA Sim simulates the individual choices that millions of travelers will make when something changes, such as adding another form of transportation, like a gondola to the Los Angeles transportation network. (UCLA Mobility Lab report, pp. 1-2 (emphasis added).)

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Using the “discrete choice” model “based on real data,” the UCLA Mobility Lab study concluded that the proposed gondola would have far fewer users, and the majority of those (2,500 of 4,690 gondola riders) would be drawn from regular users of the Dodger Stadium Express. (UCLA Mobility Lab report, p. 3.) The study concluded that only 608 vehicles would be removed from local roadways compared to current conditions, only a small fraction of the claimed vehicle reduction due to the project. (*Ibid.*)

More important, only a fraction of those who would use the gondola on the way to a game would use it afterwards. “This suggests that *fans are unlikely to wait in line for the gondola*

GO14-98

FN GO14-97 <sup>47</sup> UCLA Mobility Lab, *Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions*, Oct. 24, 2022, attached as **Exhibit P**.

*after the game*, instead taking the Dodger Stadium Express or *perhaps opting for a ride-share*, which would *increase traffic and greenhouse gas emissions* after the game.” (*Ibid.*, p. 4.) UCLA’s study is corroborated by LACTC’s 1990 Dodger Transit Access study, which showed that an aerial tram was the worst choice of the options then studied, because it had the longest wait times. “Any transit technology must accommodate a peak loading phenomenon where up to 56,000 persons enter or leave [Dodger] Stadium within a brief period of time before or after events.” (LACTC Study, *supra* fn. 43, p. iii.)

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GO14-98

The project description ridership estimate focuses the reader on future conditions unlikely to ever occur, based on an unreliably speculative and untested model that inappropriately extrapolates a tiny amount of data from only two zip codes to model the entire Los Angeles transportation network. (DEIR, Appx. N, pdf pp. 9-12.) The unbiased UCLA Mobility Study uses real-world, multi-modal transportation data to reliably predict actual Project ridership.

GO14-99

The DEIR fails as an informational document because the project description estimate of Project ridership is not based on reliable, substantial evidence, but rather on speculative assumptions.

#### **7. The DEIR’s description of Project queueing is incomplete.**

The DEIR project description describes that “[q]ueueing areas would be built into *and as necessary, adjacent to*, each of the stations to provide a gathering place for passengers waiting to enter the stations, thereby preventing crowding of sidewalks and walkways by passengers around stations.” (DEIR, p. 2-44 (emphasis added).) This project description is not sufficiently precise to inform the public where the additional queueing areas, proposed to be built on an as-needed basis, would be located. It also does not allow commenters to examine whether the spaces proposed for queueing will be of sufficient size. These failures are particularly important because the Project plans to utilize existing public parklands to accommodate its land use needs including, apparently, for queueing.

GO14-100A

For example, discussion of queueing for the Alameda Station explains some queueing for will be located “to the west north of the Placita de Dolores of El Pueblo de Los Angeles. (DEIR, p. 2-52; see also, DEIR, p. 3.2-2, providing additional description explaining that queueing would be located “in a proposed new pedestrian plaza in an area currently containing a parking and loading area for El Pueblo.”) There is no basis for the Project to simply *take* public parklands for its own needs. (See also discussion of El Pueblo land use conflicts, *infra* pp. 73-75.)

GO14-100B

The Alameda Station queueing plan also states: “Queueing for Alameda Station would occur in the planned LAUS Forecourt area on the east side of Alameda Street.” (DEIR, p. 2-44.) But while the DEIR briefly mentions the LAUS Master Plan and LAUS Forecourt and Esplanade Improvements Project, nowhere does it discuss potential conflicts with either the Master Plan or original plans for the Forecourt. (See DEIR, pp. 2-7 to 2-8.) This is especially puzzling because the Final EIR for the Forecourt and Esplanades Improvements Project from March 2018 is cited in the DEIR. (DEIR, p. 2-8, fn. 8.)

GO14-101



LA Parks Alliance also notes that the uniform resource locator (url) provided for the Los Angeles Union Station Master Plan (<https://www.metro.net/projects/la-union-station/>) now auto-loads the web page for Metro’s LA Union Station Forecourt and Esplanades Improvement Project (<https://www.metro.net/projects/la-union-station-forecourt-and-esplanade-improvements/>). (DEIR, p. 2-8, fn. 7.) Review of Metro’s list of project web pages (<https://www.metro.net/projects/>) discloses no web site url for the LAUS Master Plan. The DEIR thus provides public commenters with no easy access to the Master Plan so they may review it for consideration of potential Project conflicts with the LAUS Master Plan.

GO14-102

Further, the DEIR does not provide sufficient information as to the typical number of people expected to be queueing at *any* of the Project’s proposed stations. For a Project that proposes to push up to 10,000 people through a private transit system 30 to 40 people at a time for two hours, the failure to include this information is incomprehensible. Because the information is missing, there is *no* evidence, let alone substantial evidence, to support the DEIR’s conclusion that queueing at the proposed Chinatown/State Historic Park station can be accommodated entirely within the station structure. (DEIR, p. 3.1-42.) Review of the entire DEIR shows discussion of queueing *locations*. Queueing *times* and *volume* are nowhere found.

GO14-103

The DEIR fails as an informational document because the project description and DEIR do not provide the Project queueing information necessary to analyze and consider potentially significant conflicts between queueing locations and activities that would impact parklands used by and adjacent to the Project, and also because the DEIR does not discuss potential conflicts between the Project and the existing LAUS Master Plan and LAUS Forecourt and Esplanade Improvements project, the latter of which has already undergone environmental review.

GO14-104

**8. The DEIR’s project description regarding signage raises potentially significant environmental impacts that are never discussed or mitigated.**

The DEIR project description notes that the “proposed Project would include signage” which “may include identification and other static signs, *electronic digital displays and/or changeable message light-emitting diode (LED) boards* that include both transit information and other content, *which may include off-site advertising*... Signage would be architecturally integrated into the design of the ART system including its *stations, the junction, towers, and cabins*.” (DEIR, p. 2-45 (emphasis added).) DEIR Appendix C does not provide any additional information with details of the Project’s signage program. (See DEIR, Appx. C, pdf pp. 15, 363.)

GO14-105

The DEIR states: “Signage would be in conformance with all applicable requirements of the Los Angeles Municipal Code (LAMC).” (*Ibid.*) That signage would conform to the Los Angeles Municipal Code (which is, of course, always subject to change) is not sufficient to limit its potentially significant environmental impacts along the proposed Project alignment. For example, it is not uncommon to find electronic digital displays attached to the top of ride share vehicles, notwithstanding that California law allegedly prohibits them.<sup>48</sup> If such signage were

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<sup>48</sup> See Cal. Vehicle Code, §§ 25400, 25950. But see, Uber dot com, Uber Out-of-Home (OOH) cartop advertising program, showing a typical cartop digital advertising display frequently seen on Los Angeles

attached to the exterior of moving gondola cabins the aesthetic and other impacts at visually sensitive locations along the Project alignment, for example, within Los Angeles State Historic Park, would be potentially significant.

The DEIR’s aesthetic impact analysis acknowledges that views of the Los Angeles skyline, considered a protected aesthetic resource in the LA State Historic Park General Plan and Final EIR (see discussion, *supra* p. 39), “would be partially interrupted due to the Project” without even considering impacts from possible cabin-mounted electronic digital displays. In addition, the DEIR’s discussion of light and glare impacts is incomplete with no discussion of such displays, which invalidates the DEIR’s conclusion that operational impacts would be less than significant. (DEIR, p. 3.1-52 to 3.1-53.) The DEIR also seems to have neglected inclusion of depictions of nighttime lighting or signage to assist the public or decision makers in assessing nighttime aesthetic or other impacts.

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GO14-105

Because the project description includes the possibility that gondola cabins, among other Project elements, may have electronic digital displays but describes virtually no details and provides no limitations on their implementation, it is impossible to assess the potentially significant adverse environmental effects of the Project to Los Angeles State Historic Park or other locations along the Project corridor. The DEIR thus fails as an informational document for failing to include information necessary to allow the public and decisionmakers to consider the Project’s environmental effects and whether a mitigation measure is necessary to eliminate or limit adverse impacts.

GO14-106

**9. The Emergency Operations Plan must not be deferred.**

The project description explains that an “Emergency Operations Plan *would be prepared* as part of the proposed Project...” (DEIR, p. 2-47.) Given that the DEIR and Project proponents repeatedly refer to the aerial tram “[a]s a breakthrough and innovative technology for the region” (DEIR, p. 1-7) it is critical that the Emergency Operations Plan not be deferred but be presented as part of the DEIR to allow for public review and comment. With not even the outline of an Emergency Operations Plan found in the DEIR, it is not possible for members of the public or decisionmakers to assess potentially significant environmental effects on public services (police and fire) or potentially significant planning conflicts with City of Los Angeles Emergency Operations Plan. (See DEIR, p. 3.9-10 to 3.9-11.) The DEIR provides no discussion or analysis of these issues, and states only that the Project would comply with the City’s Emergency Operations Plan and Los Angeles Fire Code. (DEIR, pp. 3.15-19 to 3.15-20.) The project description is inadequate for failing to provide any further information on the Project’s Emergency Operations Plan.

GO14-107

**10. The project description includes the proposed Project’s improper use of public parkland as part of its “sustainability features.”**

GO14-108

FN GO14-105 | streets, available at <https://www.uber.com/us/en/about/car-advertising/> (last checked Jan. 11, 2023). A screen capture of the page depicting the cartop digital advertising display is attached as **Exhibit Q**.

The DEIR project description of sustainability features makes numerous unsupported claims. For example, it suggests the Project will “[r]educe vehicle trips to...Elysian Park, and the Los Angeles State Historic Park.” (DEIR, p. 2-48.) As already discussed, these claims are illusory and unsupported by substantial evidence. (See discussion, *supra* p. 9 (*potential* mobility hub at Dodger Stadium) and pp. 16, 23 (LA State Historic Park ridership is assumed, not supported by substantial evidence).)

Most surprising (and tone-deaf and offensive) the project description lists the Project’s unprecedented and unlawful use of LA State Historic Park (see discussion, *supra* pp. 12-26) at the very top of its list of *sustainable* site features, lumping LA State Historic Park into the category of “publicly owned property” as if it had no special protections as a historical unit of the California State Park system. (DEIR, p. 2-49.) The sustainable site feature list also suggests, with no trace of irony, that the project is sited and designed “to minimize impacts to historic and archaeological resources, and to preserve viewsheds and local character.” (*Ibid.*) The sustainable site feature list also claims it will provide an “opportunity to enhance open space and green space at the Los Angeles State Historic Park.”

These Orwellian claims are audacious and unsupported. The sustainability claims disregard that the Project is in *direct* conflict with LA State Historic Park’s General Plan and mitigation measures of the park General Plan’s Final EIR, as well as with state law that protects our state parks, especially historic units, from incursion by commercial interests. None of these obvious conflicts are adequately discussed or analyzed in the DEIR.

The DEIR project description misleadingly minimizes impacts to LA State Historic Park and insults the public’s intelligence by referencing the devastating impacts as project benefits.

#### **D. The DEIR’s Analysis of Aesthetic Impacts is Grossly Inadequate.**

This letter focuses its primary objection to the DEIR’s inadequate aesthetics impact analysis on the DEIR’s minimization of adverse aesthetic impacts to Los Angeles State Historic Park. LA Parks Alliance notes, however, its strong objection to the DEIR’s inadequate analysis of impacts to LA Union Station, El Pueblo de Los Angeles State Historic Park, and other parkland and public areas along the proposed Project corridor, for similar reasoning as included below in subsections D(1) and D(3), as well as for the reasons other commenters will undoubtedly provide in response to the grossly inadequate DEIR.

“A project will normally have a significant effect on the environment if it will...[h]ave a substantial, demonstrable negative aesthetic effect[.]” (*Quail Botanical Gardens Foundation, Inc. v. City of Encinitas* (1994) 29 Cal.App.4th 1597, 1604, quoting CEQA Guidelines, Appx. G.) “[I]t is inherent in the meaning of the word ‘aesthetic’ that any substantial, negative effect of a project on view and other features of beauty could constitute a ‘significant’ environmental impact under CEQA.” (*Ibid.*)

The DEIR fails to adequately analyze aesthetic impacts, including visual impacts along the entire Project corridor, but especially on views of and from Los Angeles State Historic Park. As the DEIR notes, “analysis of existing visual or aesthetic resources and potential visual or

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GO14-108

GO14-109

aesthetic impacts can be highly subjective, dependent upon the background of the assessor and the opinions of viewers.” (DEIR, p. 3.1-29.) California courts generally agree, finding that analysis of potentially significant aesthetic impacts is not the sole province of experts. The opinion of lay persons with respect to aesthetic and certain other impacts, particularly when presented by more than just a few persons, often constitutes substantial evidence of a significant environmental impact. (See, e.g., *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 402-403.)

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GO14-109

### 1. The DEIR’s use of images is misleading and incomplete.

The DEIR minimizes the Project’s aesthetic impacts through its use of misleading images sprinkled throughout the DEIR and by failing to provide necessary simulated depictions of the Project to assist the public and decision makers to fully understand its visual impacts. For example, Figure 2-5, depicting the “Illustrative Design of a Station” (DEIR, p. 2-15), shows a view of Alameda Station as seen from the LA Union Station property looking approximately northwest. Later, the DEIR shows a depiction of existing LA Union Station from an angle that appears to be the approximate reverse angle. (DEIR, p. 3.1-19, Figure 3.1-3; see also DEIR, Appx. C, pdf p. 46, Figure 4-6.) But where is the simulated view depicting the Alameda Station in front of LA Union Station?

Every simulated view of Alameda Station appears to have been selected to avoid depicting the station as obscuring views of LA Union Station in any way. (DEIR, Appx. C, Figures 5-1 through 5-11, pdf pp. 109-119.) But clearly there are views that would obstruct Union Station, or the depiction of Alameda Station in the bottom image of Appx. C, Figure 5-4, would not be possible.

GO14-110

Similarly, Figure 2-6 depicts the “Illustrative Design of a Tower.” (DEIR, p. 2-16.) This simulated view shows the Project’s Alameda Tower (described in the image caption as being “in the foreground”) and Alpine Tower (described as being “in the middle ground”). (*Ibid.*) But whether intentional or inadvertent, the simulated image’s use of “foreshortening” obscures the apparent height of the towers, making them appear far smaller than they really are. The “foreground” Alameda Tower appears shorter than an even nearer telephone pole, even though it is likely four or five times taller. The more distant Alpine Tower appears only half as tall as the Alameda Tower. When used to create whimsical photographs, foreshortening can provide an entertaining, comical effect.<sup>49</sup> But it can also be used to minimize the visual impact of a large structure, even if perhaps inadvertently, as it does in the DEIR.

The selection of simulated views of the Project appears calculated to minimize visual impacts of the Project. For example, a depiction of the proposed pedestrian plaza at El Pueblo is at an angle showing the plaza at a great distance while depicting only a small portion of the

GO14-111

<sup>49</sup> Most people are familiar with photographs depicting persons interacting in some way with a distant object, often a building. For example, a photo at the following web page depicts the leaning tower of Pisa as if it were part of a large ice cream cone being enjoyed by a visiting tourist: <https://huebliss.com/foreshortening-photography/> (last viewed Jan. 12, 2023).

massive station (see Figure 2-9), which the DEIR describes as “173 feet long, 109 feet wide, and 78 feet high.” (DEIR, p. 2-23.) A depiction of pedestrian improvements at the proposed Chinatown/State Park Station shows one of the few somewhat close views of the station, but from a vantage point that is almost entirely obscured by plants, pedestrians, and Project hardscape shelter elements. (Figure 2-9, DEIR, p. 2-31.) There is no other simulated view depicting the Chinatown/State Park Station in the main DEIR document. The top image of Figure 6-18 (DEIR, p. 6-33) depicts the proposed Project from the “roundhouse” area of LA State Historic Park, approximately 1,300 feet away (measured using Google maps “measure distance” feature). (See also DEIR, p. 6-30 (textual description of the simulated image).)

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GO14-111

The only close image of Chinatown/State Park Station within Appendix C appears to be Figure 5-17. (DEIR, Appx. C, pdf p. 125.) Chinatown/State Park Station completely dominates and obscures the existing park entrance. Figure 5-18 depicts a simulated view of Chinatown/State Park Station masked by a large tree in the foreground. (DEIR, Appx. C, pdf p. 126.) Figure 5-19 includes a depiction of the Project looking southeast from the southwestern portion of LA State Historic Park, directly beneath the eastern-most gondola cables. (DEIR, Appx. C, pdf. p. 127.) In this depiction the station can be seen, presumably because trees that would have obscured it had to be removed to avoid being too close to hanging gondola cabins. (See upper “existing” image.) But this depiction is taken at an angle that shows the Los Angeles skyline to the right of the station. Almost the entirety of LA State Historic Park would experience the station as being between the viewer and the Los Angeles skyline. Figure 5-20a depicts the station partially obscuring the Los Angeles skyline. (DEIR, Appx. C, pdf p. 128.) But this image is taken from an elevated angle, and therefore depicts the station as appearing lower on the horizon than it would if taken from the location of people on the lawn below. Figure 5-20b corrects this problem as it depicts a simulated image from a lower elevation. (DEIR, Appx. C, pdf. p. 129.) Curiously, however, even though this is described as from the same location as the previous depiction (from the roundhouse within LA State Historic Park), the entire City of Los Angeles skyline has somehow shifted several degrees to the right and is no longer partially obscured by the Chinatown/State Park Station.

GO14-112

It is also appropriate to note that the simulated images do not always accurately portray gondola cables. The DEIR’s cover image clearly shows six cables (two sets of three). (DEIR, cover page.) This is consistent with a textual description of the cable system. (DEIR, p. ES-3). But numerous simulated images show only four cables (two sets of two). (See, e.g., from the DEIR: Figure 2-6, Figure 4-10, Figure 6-14 (top image), and Figure 6-16 (bottom image); from DEIR, Appx. C: Figure 5-5, Figure 5-9, Figure 5-10, Figure 5-11, Figure 5-15, Figure 5-18, and Figure 5-19). These conflicting images, some with four gondola cables and some with six, make assessment of the visual impacts of the Project difficult to understand and assess.

GO14-113

Finally, Figures 5-21 and 5-22 simulate additional distant views of Chinatown/State Park Station, the first from the sidewalk in front of the LA State Historic Park, the second from the Park itself. (DEIR, Appx. C, pdf pp. 130-131.) Using the Google maps measuring tool and the image key (Figure 4-4, DEIR, Appx. C, pdf p. 44) the depicted views appear to be from

GO14-114

approximately 1,600 feet (Figure 5-21) and 2,200 feet (Figure 5-22) distant.<sup>50</sup>

The DEIR’s use of misleading images and failure to provide images that adequately convey the full scope of visual impacts along the entire Project corridor, but especially impacts associated with LA Union Station, El Pueblo de Los Angeles, and Los Angeles State Historic Park, cause it to fail as an informational document.

**2. The DEIR ignores protections and mitigation measures imposed by the certified Final EIR for Los Angeles State Historic Park’s General Plan.**

The DEIR acknowledges that the Project would have a “significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.” (DEIR, ES-58.) The DEIR asserts, however, that the essential conflict between the Project’s proposed use of land at Los Angeles State Historic Park is technical, and correctable by adoption of Mitigation Measure LUP-A which merely requires “[o]btain[ing] a Los Angeles State Historic Park General Plan Amendment.” (*Ibid.*) This assumption is grossly in error. Under California law, LA State Historic Park is plainly not available for the benefit of the Project. (See discussion, *supra* pp. 12-26.)

More important, even if a Park General Plan amendment were available to benefit the Project, and it is not, the DEIR fails as an informational document for making little effort to describe the nature of the environmental impacts intended to be addressed by the mitigation measure. Before a mitigation measure may be proposed to address a significant environmental effect, the environmental effect must be adequately identified. (Pub. Res. Code, § 21002.1.)<sup>51</sup> Without first understanding the complete nature of the significant effect it is not possible to assess whether a mitigation measure would reduce impacts to a level less than significant, or if another feasible mitigation measure would be superior. (See CEQA Guidelines, § 15126.4, subd. (a)(1)(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.”)

But the DEIR does not clearly identify the Project’s significant environmental effect(s)—it only identifies the mitigation. The DEIR assumes that whatever the significant effect is, papering over it with a revised General Plan will suffice. There is thus no way to assess whether the mitigation is sufficient to reduce the significant environmental effect(s) to a level less than significant, because the nature of the impact is not adequately described.

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GO14-114

GO14-115

GO14-116

<sup>50</sup> DEIR Figure 5-23 depicts a simulated view from the “North Broadway historic bridge” at a distance of approximately 3,400 feet using the Google maps measuring tool. (DEIR, Appx. C, pdf p. 132.) The utility of depicting the Project from the No. Broadway bridge is unclear, however the massive structure of the Chinatown/State Park Station can be easily seen even from this great distance, though it does not obscure the Los Angeles skyline from this simulated camera position.

<sup>51</sup> When a lead agency determines that a mitigation measure cannot be legally imposed, as Metro should have determined here, the mitigation measure need not be proposed or analyzed. (CEQA Guidelines, § 15126.4, subd. (a)(5); see discussion, *supra* pp. 11-25.)

FN GO14-114

FN GO14-116

The DEIR’s aesthetics analysis summarizes the goals and guidelines of LA State Historic Park’s General Plan. (DEIR, pp. 3.1-2 to 3.1-3.) While this recitation is accurate, the DEIR’s analysis falls far short. As in its project description of LA State Historic Park, the DEIR’s description of the park within Landscape Unit 4 fails to convey the importance of protected views of and from the Park. Lumping LA State Historic Park in with the other community visual features found in Landscape Unit 4, the DEIR concludes that the visual quality of LU-4 is “moderately low.” (DEIR, p. 3.1-30.) Moreover, and as will be discussed further, LA State Historic Park’s goals and guidelines are intended for use by *Park* facilities, and are simply not applicable to non-park structures, which have no place and are not permitted in the Park.

GO14-117

For its thresholds of significance, the DEIR chooses the State CEQA Guidelines Appendix G questions and employs guidance from the City of Los Angeles CEQA Threshold Guide in the analysis. (DEIR, p. 3.1-32.) While the Appendix G questions are usually considered adequate for review of a typical development project, they are not adequately responsive to the needs of a historic state park that has *aesthetic resource protections already imposed* by the Park General Plan and certified Final EIR, including mitigation measures put in place to protect the aesthetic and other resources identified in the Park’s EIR.

The primary mode of visual analysis undertaken by the DEIR to assess operational aesthetic impacts is use of existing and simulated views of the Project taken from a series of Key Observation Points (“KOPs”). (DEIR, p. 3.1-35; see also Figure 4-1 (KOP Locations Overview), DEIR, Appx. C, pdf p. 41.) As already discussed, the locations selected for these photos seem to have been selected in a manner calculated to minimize the Project’s visual impacts. (See discussion, *supra* pp. 53-55.) The DEIR also does an inadequate job explaining the selection process for KOP locations.

GO14-118

The first Appendix G question asks if the Project would “have a substantial view on a scenic vista.” (DEIR, p. 3.1-33.) The protected views of the Los Angeles skyline as seen from LA State Historic Park (along with numerous other important visual resources such as views of designated cultural and historic landmarks within the Project area) are largely swept aside as not technically comprising a scenic vista: “There are no *designated* scenic vistas present in the [Area of Potential Impact].”<sup>52</sup> (DEIR, p. 3.1-33 (emphasis added).) Construction impacts are determined to be less than significant because viewers are either deemed to generally have low sensitivity “and do not necessarily have a personal investment in these views” or because views are “only minimally noticeable because of the distant aspect of that view and the presence of vegetation” or because views of mountain ranges and the Los Angeles skyline would “continue to be available to pedestrians and recreationalists through street corridors.” (DEIR, p. 3.1-34.)

GO14-119

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<sup>52</sup> The DEIR does at least acknowledge that some viewers might view things differently: “[V]iews of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains...could be considered scenic to certain viewers *although not officially designated as such.*” (DEIR, p. 3.1-34.)

Operational impacts are likewise minimized: “no designated scenic vistas are present in the API.” (DEIR, p. 3.1-35.) The protected views from LA State Historic Park, and views of other cultural and historic landmarks in the Project are not individually analyzed. Lumping the entirety of the aesthetic views together allows the DEIR to dismiss them with sweeping generalizations:

While the Project would include tall visual elements, views of other scenic or panoramic views would continue to be visible from more prominent view locations, such as park areas, or other sections along local streets. In addition, the Project would comprise a very small portion of the broad urban view field. As such, the Project as viewed from public areas in each LU would not block prominent views of notable visual features. (DEIR, p. 3.1-35.)

GO14-120

The DEIR continues:

*Overall*, the proposed Project would not significantly block scenic or panoramic views, such as views of the downtown Los Angeles skyline, LAUS, El Pueblo, Los Angeles State Historic Park, Arroyo Seco Parkway, Dodger Stadium, and the mountains that make up the Transverse Ranges, including the San Gabriel and San Bernardino Mountains.” (*Ibid.* (emphasis added).)

The word “overall” does an awful lot of work in the above sentence. Simply put, any “analysis” that lumps a set of individual visually important views together, including views of designated cultural and historic sites (at least one specifically protected by mitigation measures in a certified EIR, see below) instead of analyzing them for their own unique individual values, must be considered inadequate.

With respect to only LA State Historic Park, the DEIR states: “[V]iews from the Los Angeles State Historic Park toward the surrounding existing urban landscape exhibit various visual values, and the proposed Project would not substantially impact these views *as shown in the simulated views*.” But as discussed above, the simulated views are entirely inadequate to convey the substantial visual impact of the Project on LA State Historic Park, as the views seem to have been selected in a manner calculated to downplay visual aesthetic impacts. Consequently they do not provide a basis to completely evaluate aesthetic impacts.

GO14-121

Of course, it is also true that courts are generally deferential to an agency’s determinations with respect to aesthetic impacts. (See, e.g., *North Coast Rivers Alliance v. Marin Municipal Water Dist. Bd. of Directors* (2013) 216 Cal.App.4th 614, 627.) Here that cuts *against* Metro’s determination for the Project, because the agency responsible for determining the aesthetic resources of Los Angeles State Historic Park, the Department of Parks and Recreation, has already well defined the park’s aesthetic resources and certified an EIR with a mitigation measure intended to protect them:

GO14-122



## Viewsheds

As viewed from the north, especially from the northern two-thirds of the property, the Park site is a large open space that is in stark contrast to the dramatic skyline of downtown Los Angeles. *Sometimes referred to as the “front porch” of the City, there are no other sites that capture this welcoming view of downtown Los Angeles.*

Views of Elysian Park present a welcoming view of green hills and trees. The more distant views of the Verdugo Hills and the occasionally snow-covered San Gabriel Mountains provide vistas of natural landscapes.

In the immediate vicinity of the Park are structures with distinct architectural styles, including a variety of buildings in the Chinatown area, the Chinatown Transit Station, the Capitol Milling Company building, and the Broadway Bridge. (LASHP General Plan, pdf. pp 52-53 (emphasis added).)<sup>53</sup>

The Park’s Final EIR acknowledges that it is located “in a dense urban environment,” but that fact is an additional justification *to protect visual resources*, including views seen *from* the Park, and also views seen *of* the Park as seen from *outside* its boundaries:

This Park is situated in a dense urban environment. It does, however, provide a *spectacular view of the downtown Los Angeles skyline*, as well as *views to the nearby Elysian Park and the Verdugo Hills, open space elements that can be rare in an urban landscape. Any changes that substantially degrade the visual experience for park visitors and others viewing the Park from adjacent property have the potential to cause significant impacts.* (*Ibid.*, pdf p. 121 (discussing the purpose of Mitigation Measure Aes-1) (emphasis added).)

The certified Environmental Impact Report for LA State Historic Park protects these important visual resources by restricting the type, location, screening, and materials of structures permitted in the park:

**Mitigation Measure Aes-1.** Visual impacts can be avoided or reduced by appropriate siting, design, and selection of materials. Specific project designs will define aesthetically appropriate design features, identify visual resources, and identify optimum methods for protecting existing resources. Potential aesthetic quality impacts associated with the development of new facilities shall be reviewed at the project-level for specific facilities or management plans proposed. Mitigation measures include, but are not limited to:

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GO14-122

GO14-123

FN GO14-122 <sup>53</sup> The Los Angeles State Historic Park General Plan and Final EIR was approved/certified by the State Park and Recreation Commission on June 10, 2005. (LASHP General Plan, pdf p. 125.)

- Implement design practices that reduce the overall negative aesthetic effect of new facilities, including, but not limited to:
  - Include vegetation to screen negative views, or soften the visual effect of parking areas, visitor facilities, roads, trails, or transit corridors, where appropriate;
  - Incorporate architectural site/design elements that support and are consistent with the plan vision;
  - Where night lighting is necessary, direct the lighting downward and locate new exterior lighting such that it is not highly obtrusive;
  - Evaluate the location of structures and activity areas to enhance positive views within and outside of the Park site;
  - Design and site new roads and trails to minimize grading and the visibility of cut banks and fill slopes; utilities should be placed underground where feasible;
  - Schedule construction and maintenance activities to decrease any negative impacts to visitors and adjacent property owners.

(LASHP General Plan, pdf pp. 121-122.)

Moreover, the LA State Historic Park General Plan and Final EIR created the above mitigation for application to *Park* structures permitted by its General Plan: “Potential installation of facilities *allowed by the Plan* may constitute a potentially significant aesthetic change...” (*Ibid.*, pdf. p. 115 (emphasis added).) The General Plan and Final EIR do not contemplate mitigations for structures that are *not* permitted by the Park’s General Plan. “[P]otential facilities” evaluated in the General Plan and Final EIR do not provide for non-Park facilities (see *ibid.*, pdf pp. 132-133) which *are not permitted in a historical unit of the state park system*. (Pub. Res. Code, § 5019.59.) There is no appropriate siting or screening possible for an intruding non-park, commercial structure in LA State Historic Park. The DEIR lists the Park’s General Plan goals and guidelines (DEIR, pp. 3.1-2 to 3.1-3.) as if they can be applied to any structure, including non-park structures, but the General Plan goals and guidelines are intended only for *permissible* structures. Other structures are simply not permitted.

As discussed above, the State Parks Commission, in approving the General Plan and certifying its Environmental Impact Report, also protected views *of* the Park. The DEIR’s use of City of Los Angeles CEQA Thresholds to disregard the Park’s Mitigation Measure Aes-1, which protects views of the Park from both public *and private* locations, thus improperly modifies an adopted mitigation measure. (See DEIR, p. 3.1-47 (analysis of LU-4 including LA State historic Park): “the operation of the proposed Project within LU-4, would not substantially degrade the existing visual character or quality *of public views* of the site and its surroundings, and the impact would be less than significant.”; see also DEIR, p. 3.1-47: “[V]isual impacts under the L.A. CEQA Thresholds Guide are assessed based on changes to *public views*.”)

This is improper. A lead agency may not cancel or modify a previously adopted mitigation measure without reviewing its continued need, explaining the change, and supporting its determination with substantial evidence. (See *Katseff v. Dept. of Forestry & Fire Protection* (2010) 181 Cal.App. 4th 601, 614.) The appropriate lead agency to modify mitigation Aes-1 is

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GO14-125

the Department of Recreation and Parks, not Metro. But the Project EIR must explain why Aes-1 is no longer needed and appropriate to change, and support this determination with substantial evidence. Here Metro has not acknowledged the existence of the mitigation measure, let alone explained why it is no longer needed or supported its conclusion with substantial evidence.<sup>54</sup>

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GO14-125

The DEIR’s description of gondola movement with respect to protected views of the Los Angeles skyline also minimizes the Project’s aesthetic impacts. “The cabins would be *constantly moving in and out of view*, and the cables have similar characteristics to the overhead powerlines that are prevalent in views in this area. As such, the proposed cables and cabins would not significantly impact views in this area.” (DEIR, pp. 3.1-45 to 3.1-46 (emphasis added).) First, no powerlines are located directly over the top of LA State Historic Park, and gondola cables are larger than powerlines. (DEIR, p. 3.4-19). If gondola cables are both physically closer and also larger, it is logical that they will have a much greater visual impact than distant, smaller powerlines. Second, and more obviously, if gondola cabins are “constantly moving in and out of view” they will have a greater distracting visual impact, especially in the evening and at night when they are lit or display signage (particularly potential electronic digital display signage). The DEIR fails to evaluate and minimizes the visual impacts of gondola cables and cabins.

GO14-126

The DEIR concludes not only that the Project would not have significant aesthetic impacts, but also that it would provide significant visual *benefits* to LA State Historic Park. (DEIR, p. 3.1-46.) This is absurd. Compare, for example, the before and after images shown in Figure 5-17 of the existing entrance at the Park’s southwest corner (DEIR, Appx. C, pdf p. 125):



GO14-127

The proposed siting of the Project’s Chinatown/State Park Station *within* LA State Historic Park at the Park’s southwest corner (where many visitors first experience views of the park as they

<sup>54</sup> The DEIR notes the existence of the Park’s Final EIR (see DEIR, p. 3.1-1, fn. 1), but does not mention, discuss, or analyze modifications to mitigation measures that would be necessary due to the Project. With respect to CEQA’s ability to protect *private* views, see *Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 402-403.

arrive) belies the notion that “visual changes of the proposed Project are minimized somewhat” by its southwest corner location.

As the DEIR documents, the massive Chinatown Station (DEIR, p. ES-8: “200 feet long, 80 feet wide, and 98 feet tall at its tallest point”) can be easily seen from adjacent views, which the Park’s Final EIR protects. (See, e.g., Figure 5-23, DEIR, Appx. C, pdf p. 132 (depicting a simulated view from the “North Broadway historic bridge” approximately 3,400 feet distant.) Protected views of the Park may also be visible from Elysian Park and other distant elevated locations, but the DEIR provides no simulated views. At ninety-eight feet tall, it is a certainty that Chinatown/State Park Station cannot be screened with vegetation to minimize its impact.<sup>55</sup> Nor does the DEIR suggest screening is needed. (But see LASHP General Plan and Final EIR, mitigation measure Aes-1, describing a general need for screening of structures within the Park.)



*Close up – Chinatown/State Park Station (DEIR Appendix C Figure 5-23)*

The discussion above does not include consideration that to install the massive Chinatown/State Park Station removal of a substantial number of trees will be necessary. The DEIR describes that the Park includes “mature trees” (DEIR, p. 3.1-24), but the only significant discussion of trees in the aesthetic impact analysis of LA State Historic Park describes how “existing views of downtown from other areas within the park are already interrupted under existing conditions by trees...,” ignoring that the trees in the Park are themselves an aesthetic resource, and entirely neglecting that 24 trees on the State Historic Park property and six street trees adjacent to the Park would be removed to allow construction of the Chinatown/State Park

FN GO14-128<sup>55</sup> LA Parks Alliance notes that Design Option C, which would be 35 feet taller than the preferred Project, would have an obviously greater impact on protected views of and from LA State Historic Park.

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GO14-129

Station, and *an additional 51* trees would be removed to accommodate the gondola alignment over the Park. (DEIR, p. 3.4-23.)

The aesthetic analysis does not consider the function of trees within the Park landscape that would be removed. For example, are they part of the Park General Plan and Final EIR mitigation that screens and softens the visual impact of adjacent urban areas using vegetation? The aesthetic analysis, in fact, entirely *ignores* the removal of these 81 trees. They are in the way of the Project component and alignment, so they will be removed without respect to their age, purpose, or aesthetic or habitat value. No trees can be planted in their place within the gondola alignment—they would interfere with the Project.

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GO14-129

In a letter to the editor recently published in the Los Angeles Times, Kathleen Johnson, executive director of Los Angeles River State Parks Partners, a “cooperating association” for LA State Historic Park, justifiably refers to the gondola Project’s removal of trees and taking of parkland as an “environmental injustice.”<sup>56</sup> LA Parks Alliance agrees.

### 3. The DEIR’s analysis of Project lighting impacts is incomplete.

The DEIR includes a Lighting Study. (DEIR, Appx. C). The study is incomplete for failure to consider the totality of the Project’s proposed signage program, which “may include identification and other static signs, *electronic digital displays and/or changeable message light-emitting diode (LED) boards* that include both transit information and other content, *which may include off-site advertising...* Signage would be architecturally integrated into the design of the ART system including its *stations, the junction, towers, and cabins.*” (DEIR, p. 2-45.) The Lighting Study neither discusses this nor provides additional information regarding the signage program.

GO14-130

The DEIR fails to consider the specific impacts of lighting and glare on views *from and of* LA State Historic Park protected aesthetic resources. As the Park’s General Plan Final EIR states: “Inappropriate lighting throughout the Park may create visual impacts. Obstructing an existing viewshed (such as the Los Angeles downtown skyline) may be considered an adverse impact.”

Thus, lighting or glare created or made worse by any Project component, including its gondola cabins, which the signage program acknowledges may include electronic digital displays integrated into the design of stations, towers, and cabins, must be considered in the DEIR. But the DEIR relies only on the City of Los Angeles municipal code, which is subject to change, to protect LA State Historic Park, even though the Park is also (and better) protected by the Park’s General Plan and Final EIR, which requires minimizing or eliminating inappropriate lighting. As Project cabins traverse the airspace of the Park lighting from within the gondola cabins, lighting from digital displays, lighting of traditional advertising, reflection of light from other sources,

GO14-131

<sup>56</sup> Kathleen Johnson, *Damaging a hard-won park* (LA Times letter to the editor), published Jan. 11, 2023, attached as Exhibit R. (More information on LA River State Parks Partners, including its “cooperating association” status with state parks, is available at its website: <https://www.larsppartners.org>.)

even unlit cabins traveling across the nighttime backlit skyline, could constitute potentially significant environmental effects of the Project. The DEIR studies none of them.

The DEIR's lighting analysis is incomplete and therefore inadequate. The Final EIR must include a mitigation to ensure gondolas are not vehicles for electronic digital display advertising that would cause a significant light/glare impact at LA State Historic Park. (Additional criticism of the DEIR's inadequate lighting analysis is found in Exhibit S (LPP letter), *supra* p. 64 fn. 59, pp. 6-7. LA Parks Alliance adopts these concerns as if fully set forth herein.)

#### **4. The Shading Impact analysis discloses a significant but unmitigated impact at LA State Historic Park.**

The DEIR describes that the LA CEQA Thresholds Guide considers shading impacts of more than three hours between the hours of 9:00 am and 3:00 pm Pacific Standard Time between late October and early April, or for more than four hours between the hours of 9:00 am and 5:00 pm Pacific Daylight Time between early April and late October, to be a significant impact. (DEIR, Appx. C, pdf p. 94.) It goes on to describe shading impacts of shade-sensitive uses during winter months at LA State Historic Park as being significant under the DEIR's threshold:

Fall shadow diagrams for the proposed Chinatown/State Park Station are depicted on Figure 72 through Figure 76 of Appendix B. A small segment of the western walkway in and near the southern entrance of Los Angeles State Historic Park would be shaded for four hours from 9:00 a.m. to 1:00 p.m. A small segment of walkways in the eastern side of the park would be shaded for four hours from 12:00 p.m. to 4:00 p.m. ...<sup>57</sup>

[T]he proposed Chinatown/State Park Station would result in the shading of shade-sensitive uses for more than three hours between the hours of 9:00 a.m. and 4:00 p.m. Pacific Standard Time (between late October and early April) in the Winter. Small portions of the eastern and western walkways and park green space near the southern entrance of the park would be shaded by the proposed Chinatown/State Park Station in the Winter.”  
(*Ibid.*, pdf p. 98.)

Despite fitting within the DEIR's chosen threshold to find a significant shading impact, the DEIR nonetheless concludes that the shadow impacts due to construction of Chinatown/State Park Station would be less than significant even though it provides no mitigation measures to lessen the significant impact. (*Ibid.*, pdf pp. 98-99.) The aesthetic analysis is therefore inadequate for identifying a significant impact under the threshold but determining it not to be significant, as well as for failing to propose a mitigation measure to reduce or eliminate the adverse impact.

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<sup>57</sup> LA Parks Alliance notes that the main DEIR document neglects to mention the four-hour shading impact between 9:00 am to 1:00 pm detailed in Appendix C. (DEIR, p. 3.1-55.)

**E. The DEIR’s analysis of the Project’s potentially significant impacts to biological resources is incomplete and inadequate.**

The DEIR provides the essential background on the regulatory setting for protection of biological resources (DEIR, pp. 3.4-1 to 3.4-4) but nonetheless fails to perform an adequate analysis of potentially significant impacts in the Project area.

The DEIR’s wildlife survey concludes that only a limited number of bird species are found in the biological survey area, including ten common species and three non-native species. (DEIR, pp. 3.4-10 to 3.4-11.) But the DEIR limited the survey area to only “the proposed aerial alignment, stations, junctions, towers, cabins, and cables, and a 500-foot survey buffer around the alignment.” (DEIR, p. 3.4-13.) Because the Project will cause direct physical changes and also foreseeable indirect physical changes in the environment beyond the 500-foot survey buffer area, in particular in Los Angeles State Historic Park, this survey area was too small to capture the full extent of potentially significant biological resource impacts.<sup>58</sup>

The DEIR describes two field surveys having been performed. The first survey was conducted April 1, 2020, “to document and photograph existing biological resources” and included a survey of “tall structures such as mature trees, power poles and towers, billboards, and buildings” searching for the “presence of nests.” (DEIR, p. 3.4-14.) A second “follow-up” survey was conducted on April 24, 2021, an entire year later, “to verify and record tree species occurring in the Project component footprints,” though apparently not to survey for the presence of additional wildlife species that may not have been present during the 2020 survey. (*Ibid.*)

GO14-133

The DEIR notes: “Raptor species such as red-tailed hawk, Cooper’s hawk, great horned owl, American crow, and common raven are known to use tall structures as nesting sites in urban environments.” It continues: “Red-tailed hawk were observed flying in the vicinity of Dodger Stadium during the 2021 survey.” (*Ibid.*, p. 3.4-11 (latin species names omitted.)) The DEIR found no raptor nests but noted “[i]ndications of songbird nesting activities were detected during the 2021 survey in the Los Angeles State Historic Park.” The DEIR also stated that while “[n]o active nests were detected,” “ornamental landscaping, including mature trees throughout the [biological survey area], provide potentially suitable nesting habitat for songbirds and raptors.” (*Id.*) The DEIR’s summary is consistent with the full biological resource assessment found in DEIR, Appendix E. (See DEIR, Appx. E, pdf p. 44.)

A comment letter from Land Protection Partners explains why the biological survey area used by the DEIR is inadequate.<sup>59</sup> LA Parks Alliance adopts the Land Protection Partners letter as its own position, and **requests that Metro respond to the entire letter as if fully set forth herein.**

<sup>58</sup> See Figure 4, DEIR, Appx. E, pdf p. 26, showing the area of the biological survey area, leaving out more than half of Los Angeles State Historic Park from the survey area.

<sup>59</sup> Travis Longcore, Ph.D & Catherine Rich, J.D., M.A., letter to Cory Zelmer re LA Aerial Rapid Transit Project (“LPP letter”), Jan. 16, 2023, attached as **Exhibit S**.

The biological survey area should have extended “up to 200 feet upward from the alignment” and included sufficient range to include birds within a reasonable distance of the alignment, since typical songbirds fly at a rate of 30 miles per hour (meaning they would cross the entire study area in “less than 23 seconds”). (LPP letter, p. 2.) It should also have not been completed in a single daytime session. The LPP letter explains that “a single daytime survey in April cannot describe the volume and diversity of migratory birds that traverse the project location at night...during spring and fall migrations,” and such a limited survey is inadequate and cannot be considered substantial evidence to support the DEIR’s conclusions. (*Ibid.*)

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GO14-133

**1. The DEIR’s analysis of potentially significant biological impacts due to bird collisions is inadequate and not supported by substantial evidence.**

The DEIR minimizes the risk of operational impacts in the form of bird collisions with the proposed stations, junctions, towers, cabins, and ropeway cables, finding that “[s]ignificant impacts typically occur when towers or wires are constructed in migratory corridors and obstruct the flight paths of migrant birds.” (DEIR, p. 3.4-18.) The DEIR asserts that because the proposed Project is “not in or near a known avian migratory corridor and lacks habitat and topographic features that would promote concentrated avian migratory activity” impacts to migratory birds would be less than significant. (DEIR, pp. 3.4-18 to 3.4-19.)

The DEIR explains that collisions with resident or migrant birds using habitat areas found in the biological resource area would be able to detect and avoid collisions with larger physical components of the Project (e.g., stations, towers, and cabins). (DEIR, p. 3.4-19.) The DEIR asserts that bird strikes with gondola cable systems would be unlikely, because compared to power transmission lines, gondola cables are much larger (“1.75 to 2.5 inches in diameter” compared to only “1 to 2 inches in diameter” for transmission lines, and only “0.4 to 0.5 inches in diameter” for shield wires). (*Id.*)

GO14-134

There are two problems with this analysis. First, it appears to be unsupported by substantial evidence. Appendix E of the DEIR does cite a paper by Bernardino, et al., explaining that “[p]owerline-specific factors” such as wire diameter and the number of vertical wire levels are factors that “*may* provide insights about the potential for birds to collide with ropeway cables.” (DEIR, Appx. E, pdf p. 52 (emphasis added).)<sup>60</sup> That such factors *may* be relevant does not justify evading an actual analysis of the potentially significant environmental impact of deadly bird collisions. In fact, the cited paper notes “there is *comparatively little scientific evidence for power line-specific factors, namely* what is the impact of the *number of vertical levels, or wire height and diameter.*” (Bernardino, *supra* fn. 59 (emphasis added).) This is precisely the *opposite* of the meaning imputed to the paper by the DEIR.

“[T]here is evidence that power line collision mortality can even lead to changes in migratory patterns and flyways.” (Bernadino, citing Palacín et al., 2017). This may explain, in

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<sup>60</sup> Citing J. Bernardino, et al., *Bird collisions with power lines: State of the art and priority areas for research* (hereafter “Bernadino”), *Biological Conservation*, 222: 1-13 (2018), available at: <https://www.sciencedirect.com/science/article/abs/pii/S0006320717317925>.



part, the DEIR comment that the Project area is not on a known migratory route. The cited paper also notes “collision as the most widespread interaction” between birds and infrastructure such as the Project. The Bernardino paper explains that “*virtually any aerial wire can pose an obstacle to flying birds.*” (*Ibid.* (emphasis added).)<sup>61</sup>

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GO14-134

Second, the gondola cables are viewed by the DEIR as very large for purposes of considering their risk to bird strikes. (DEIR, p. 3.4-19.) But these very same cables are considered insignificant in the Project’s aesthetic analysis, because “they have similar characteristics to the overhead powerlines that are prevalent in views in this area. As such, the proposed cables would not significantly impact views in this area.” (DEIR, p. 3.1-37.) The gondola cables seem to have the perfect goldilocks size: they are deemed to be *small* (like powerlines) when it comes to assessing their visual impact (notwithstanding that they are not in the distance, but directly overhead within LA State Historic Park), but so *large* (unlike powerlines) that birds will have no difficulty in seeing them.

GO14-135

In addition, it is well-known that bright lights such as those at a sports stadium like Dodger Stadium frequently attract birds.<sup>62</sup> The proposed Project would be constructed between Dodger Stadium and the Los Angeles River, home to an ever-expanding presence of waterfowl and other birds. In addition, LA State Historic Park’s easternmost area very near the river provides additional habitat for birds and wildlife. As discussed above, these areas should have been included in the biological survey area but were not.

GO14-136

The Land Protection Partners letter addresses the above points and others in far greater detail than the DEIR. The LPP letter notes that the DEIR arguments and conclusions regarding cable size, cable spacing, alleged increased visibility of three cables, relative risk compared to transmission lines, concentration of avian movement, and artificial light in the Project area, among other things, are incorrect and unsupported by substantial evidence. The letter details specific species that are particularly susceptible to collision that are found in the Project area. The letter finds that the DEIR *misrepresents the scientific literature* and that the Project will result in a *significant number of bird kills*, an impact that *cannot be mitigated*. (LPP letter, pp. 2-5.) Unlike the DEIR, the letter is supported by substantial evidence throughout.

GO14-137

As one example of the kind of species that might be impacted by the gondola cables, drawn towards Dodger Stadium by its bright stadium lights, last fall during the 2022 MLB playoffs between the Los Angeles Dodgers and San Diego Padres, a large goose flew onto the field, interrupting the game for a time before it was eventually captured, removed from the field, and ultimately released to an undisclosed location.

GO14-138

<sup>61</sup> The DEIR’s “state of the art” article (section 3.4, footnote 17) dates to 2012. The 2018 Bernardino article’s purpose is to update the state of the art on bird collisions with power lines based on much newer studies and to “identify major knowledge gaps that should be the subject of subsequent research.” (*Id.*)

<sup>62</sup> See, e.g., Valerie Fellows, *Dim the Lights for Birds at Night!*, US Fish & Wildlife Service, Apr. 28, 2022, available at: <https://www.fws.gov/story/2022-04/dim-lights-birds-night>.

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Travis Longcore, president of the Los Angeles Audubon Society and an adjunct professor at UCLA, identified the bird as a greater white-fronted goose. An article in the Los Angeles Times explained the occurrence:<sup>63</sup>

[Greater white-fronted geese] are known to migrate from the Arctic tundra in Alaska, where they breed in the summer, and fly south in the fall along the Pacific, settling in the wetlands in the Central Valley of California or even farther south into Mexico, a flight pattern the birds have carried out for thousands of years, Longcore said.

The bird on Wednesday was probably following this migration pattern when it became distracted by the stadium lights that tower above Chavez Ravine, a common obstacle for migrating birds, said Longcore, whose research includes the effects of light pollution on migratory birds.



Greater white-fronted goose from article, Wally Skaliy / Los Angeles Times

The article later continues:

Most white-fronted geese are spotted along bodies of water, such as lakes at MacArthur and Echo parks, at the L.A. River, or in the wetlands of Playa del Rey or the South Bay, Longcore said. The goose Wednesday would have been accustomed to landing in water, which would explain its hard landing on the field, he said.

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<sup>63</sup> See Jonah Valdez, *What happened to the goose that stole all the attention at Dodgers playoff game?*, LA Times, Oct. 13, 2022, available at: <https://www.latimes.com/sports/dodgers/story/2022-10-13/what-happened-to-the-geese-at-dodger-stadium-experts-say-its-a-rare-species-from-alaska>.

Bird enthusiasts have been buzzing online in recent weeks about large flocks of greater white-fronted geese spotted throughout coastal Southern California, said Kimball Garrett, a researcher at the Natural History Museum of Los Angeles County.

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GO14-138

The failure of the DEIR to fully evaluate the risk to migratory and other birds or to support its conclusions with substantial evidence must be corrected, and the DEIR revised and recirculated for additional public comment.

**2. The Project design is likely to result in large Rock Pigeon roosts.**

As discussed in the Land Protection Partners letter, the DEIR includes depictions that show station structures with large open canopies with exposed structural beams and girders. (See, e.g., Figure 2-5, DEIR p. 2-15; cover image, DEIR, Appx. C; Figure 5-4, DEIR, Appx. C, p. A-4.) This design is “likely to result in large Rock Pigeon roosts” which is likely to necessitate “chemical and/or physical methods that would be used to exclude pigeons from roosting within these structures,” a potentially significant environmental effect of the Project that is not disclosed in the DEIR. (LPP letter, pp. 7-8.)

GO14-139

**3. The Least Bell’s Vireo, an endangered species, has been sighted in LA State Historic Park; the DEIR must re-evaluate its faulty conclusion of no Project impacts to protected wildlife species.**

The DEIR states: “Because the BSA [biological survey area] has been completely disturbed during urban development and consists of roadways, sidewalks, buildings, and rail tracks, habitats preferred by regional special-status wildlife species are not present (refer to Appendix A, Table B).” (DEIR, Appx. E, pdf p. 47.) The “least Bell’s vireo” is specifically called out in the DEIR as one of 39 special-status species identified in the California Natural Diversity Database (CNDDDB) “to have historically been recorded from the Los Angeles surrounding eight quadrangles, and from a search of IPaC for the Project area.” (*Ibid.*, pdf pp. 45-46.) The DEIR notes that “[t]here are no CNDDDB records of any federal or State-listed wildlife species from the BSA in over 100 years” and concludes: “The BSA does not provide habitat potentially suitable for any of the regional special-status wildlife species identified during the literature review. The Project area *has been completely disturbed and the native habitats these species are known from have long been removed from the BSA.*” (*Ibid.*, pdf. p. 46.)

GO14-140

Notwithstanding the DEIR’s conclusions, a male least Bell’s vireo was recently surveyed in LA State Historic Park on May 24, 2022, by UCLA Institute of the Environment and Sustainability doctoral student, Jenny Aleman-Zometa.<sup>64</sup> Ms. Aleman-Zometa’s doctoral work includes researching the way birds use local parkland, particularly parks sited on former brownfields such as LA State Historic Park, to learn the beneficial impact of these parks on

<sup>64</sup> Telephone interview with Jenny Aleman-Zometa, doctoral student, UCLA Institute of the Environment and Sustainability, Jan. 13, 2023. See also <https://www.ioes.ucla.edu/person/jenny-aleman-zometa/>.

species diversity. Ms. Aleman-Zometa took several images and a short video of the least Bell's vireo during her survey.

The images and video of the least Bell's vireo have been reviewed by leading ornithologists, who confirmed the species' identification and noted that its birdsong is evidence of a "pioneering male" beginning to use LA State Historic Park as habitat. Given this clear evidence of a protected special-status endangered species surveyed recently at LA State Historic Park, the question is what impact the proposed Project might have on this protected species listed as endangered under both state and federal law. The DEIR has not considered this question.



Least Bell's Vireo in LA State Historic Park, May 24, 2022 / courtesy Jenny Aleman-Zometa<sup>65</sup>

Ms. Aleman-Zometa's May 2022 survey at LA State Historic Park included observation of 35 native bird species. Within the Project alignment and 500-foot buffer she surveyed 16 species, including in the southwest part of the Park. Her survey included common species but also included migrating, wintering, and breeding bird species.

Even if the DEIR's biological survey area with a 500-foot buffer from the Project alignment were sufficient elsewhere, and it was not (see LPP letter, p. 2), it did not consider the need to expand in the area of LA State Historic Park due to direct and indirect physical changes in the environment at the Park due to the Project. Activities at LA State Historic Park that currently occur at the western side of the park in the vicinity of the proposed gondola alignment would be moved significantly eastward as a result of the Project, towards Park areas featuring significantly more wildlife habitat including, when there is sufficient rain as now, an intermittent riparian wetland area with willows and mulefat.<sup>66</sup> For example, the DEIR suggests that special

<sup>65</sup> Full format images and video are available on request and will be temporarily available at: [https://www.dropbox.com/sh/m1wzhkbvf9md5g5/AADgRm\\_LqbwvA0imlevui3KNa?dl=0](https://www.dropbox.com/sh/m1wzhkbvf9md5g5/AADgRm_LqbwvA0imlevui3KNa?dl=0).

<sup>66</sup> That there is additional wildlife habitat at the Park's eastern side does not diminish the significant loss of habitat, including removal of 81 trees necessary for the Project as well as operation of the gondola, at the Park's western side. As Ms. Aleman-Zometa explained, "there is still a lot of diversity present at the western side of the Park where the gondola would be sited, and that will be adversely impacted."

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GO14-140

GO14-141

GO14-142

FN GO14-140

FN GO14-142

event stages, currently located at the western edge of the Park, be moved toward the location of the Park’s “Roundhouse” feature. (See DEIR, p. 5-62.) This particular suggestion is not feasible—the Roundhouse is a significant archaeological site at the Park and is inappropriate as a stage location. Another location would have to be found for staging, likely further east where it is more likely to have an adverse impact on wildlife, including the endangered least Bell’s vireo.

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GO14-142

**4. The DEIR fails to consider habitat and wildlife corridor impacts due to brush clearance activities at the Project’s proposed Stadium Tower.**

“If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed...” (CEQA Guidelines, § 15126.4, subd. (a)(1)(D), citing *Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986.) The DEIR describes tree removal and brush clearance activities necessary in the area surrounding the Project’s proposed Stadium Tower site. (DEIR, pp. ES-80 to ES-83 (describing Mitigation Measures WFR-1 and WFR-2).) The DEIR notes that at least 31 “significant” pursuant to City of Los Angeles regulations will be removed at the Stadium Tower site (10 significant trees for the Stadium Tower, and 21 additional significant trees for the Stadium Tower Fire Buffer Zone for Construction). (DEIR, Table 3.4-1, p. 3.4-23.)

GO14-143

The DEIR fails to consider whether removal of the significant trees or other brush clearance requirements may cause a potentially significant environmental effect on wildlife corridors or habitat in the Stadium Tower area. LA Parks Alliance recommends that Metro consult with the Santa Monica Mountains Conservancy as the appropriate Trustee agency with relevant expertise for wildlife corridors and habitat in the Santa Monica Mountains Zone for its advice with respect to determining whether the impact is significant, and if it is considered a significant impact, for appropriate mitigations to reduce the environmental impact to a level less than significant.<sup>67</sup>

**F. The Project’s Significant Historic and Cultural Impacts Must Be Properly Mitigated or Avoided.**

**1. Mitigation measures for sensitive cultural and historic resources are improperly deferred.**

The DEIR describes many historic and cultural resources within the Project corridor that would be significantly impacted by the Project. These include Los Angeles Union Station, El Pueblo de Los Angeles Historic State Park, and Los Angeles State Historic Park, among other important resources. (DEIR, pp. 3.5-10 to 3.5-33.) The DEIR also identifies numerous important archaeological resources, which is unsurprising given the proposed Project’s location within and near areas of first human settlement in the Los Angeles region, dating back as much as 10,000 years. (LASHP General Plan, pdf. p. 29.)

GO14-144

FN GO14-143 <sup>67</sup> “[T]he Conservancy should be considered a trustee agency for any CEQA project which affects natural resources within the [Santa Monica Mountains] Zone.” (Exhibit F, *supra* fn. 7 p. 3.)

As described above, the Project has obvious aesthetic impacts at many of these sites. In addition, the DEIR describes significant impacts requiring mitigations at many other sites. Mitigations are necessary to protect specific cultural and archaeological resources at El Pueblo, including the Winery, the El Grito mural, and Avila Adobe (MM-VIB-A and MM-VIB-B, DEIR, pp. ES-33, ES-36, ES-67), archaeological resources generally (MM-CUL-A, DEIR, pp. ES-41 to ES-42, a mitigation measure relating to “all ground disturbance activities extending into native soils within known archaeological sites and other areas of high sensitivity”) and to create an “Archaeological Resource Worker Training Program” (MM-CUL-B, DEIR, p. ES-44) and “Archaeological Testing Plans” (MM-CUL-C, for Alameda Station, DEIR, p. ES-45; MM-CUL-D, for LA Union Station; MM-CUL-E, for Los Angeles State Historic Park, DEIR, p. ES-48). If significant resources are found pursuant to MM-CUL-E, an additional mitigation would reconfigure planned improvements at LA State Historic Park. (MM-CUL-F, DEIR, p. ES-49.)

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GO14-144

LA Parks Alliance objects that all these mitigations are improperly deferred. Deferring mitigations is generally impermissible under CEQA. (See CEQA Guidelines, § 15126.4, subd. (a)(1)(B).) Particularly where, as here, known sensitive cultural and archaeological resources are within the impact area of the Project and could (indeed, are likely to be) harmed by construction activities, it is appropriate for mitigation measures to be fully formulated and subject to public review in advance of certification of the environmental document. To the extent that mitigation measures may require some additional study to be fully formulated, that study must occur now, before environmental review is completed and certified, and in advance of the commencement of any construction activities.

GO14-145

Given the existence of at least one feasible alternative that eliminates or lessens virtually all the Project’s potentially significant and significant and unavoidable impacts (DEIR, pp. ES-19), it would be irresponsible to construct anything within archaeologically sensitive areas until the full extent of those resources are known, and if appropriate excavated or otherwise preserved and protected on site.

GO14-146

**2. The DEIR ignored numerous NOP scoping comments urging protection of the “Monument to Sharing” artwork at LA State Historic Park**

The Spring Street Alternative described in DEIR Chapter 4.0 “Alternatives” should not have been presented as a project alternative. As a project alternative that would have even greater impacts than the preferred alternative due to its location running directly through the center of Los Angeles State Historic Park, it is not an appropriate alternative, since it does not reduce environmental impacts. (*Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1087, citing CEQA Guidelines, § 15126.6, subd. (a).)

GO14-147

Numerous scoping comments discussed grave concern about a public artwork known as “Monument to Sharing” located at one of the entrances to LA State Historic Park that would be damaged by the Spring Street Alternative, presented as one of two alignment alternatives during the Project’s scoping process. (See, e.g., DEIR, Appx. A, pp. 130-133, 140, 226, and 278, among others.) Despite the scoping comments, the discussion of the Spring Street Alternative does not mention aesthetic or cultural impacts to the “Monument to Sharing” artwork.

### **G. Potential Dewatering May be Toxic and Require Mitigation.**

The DEIR discusses groundwater conditions in the Project area as known to be toxic in the vicinity of construction activities proposed at Los Angeles State Historic Park. (DEIR, p. 3.10-26). Groundwater toxicity at other locations is “not specifically known.” (*Id.*) The DEIR proposes Mitigation Measure HAZ-1 (“Prepare a Soil and Groundwater Management Plan”) to address construction impacts:

The Soil and Groundwater Management Plan shall provide a summary of the environmental conditions at each Project component site, including stations and towers. The Soil and Groundwater Management Plan shall include methods and procedures for sampling and analyzing soils and/or groundwater to classify them as either hazardous or nonhazardous; and if identified as hazardous, shall include additional methods and procedures for the proper handling and removal of impacted soils and/or groundwater for off-site disposal and/or recycle. (DEIR, pp. ES-53 to ES-54.)

The DEIR describes construction activities as potentially requiring dewatering operations if “nuisance seepage from boreholes” or from excavation activities is encountered. (DEIR, pp. 3.10-26 to 3.10-27.) The Project will require deep piles at several Project component locations likely to be lower than the water table. (See Table 2-4, DEIR, p. 2-51, describing one drilled pile location of 80 feet and five drilled pile locations of 120 feet or greater; the Dodger Stadium Station drilled piles would be only 55 feet deep.)

LA Parks Alliance notes that in the EIR for Metro’s Link Union Station, Metro proposed a series of mitigation measures to deal with dewatering operations, including dewatering for discharge of non-stormwater wastes.<sup>68</sup> While those proposed mitigations were also largely deferred, primarily requiring compliance with regulations and existing dewatering permits, it was *Metro* that would supervise and ensure that mitigations were properly enforced, not the Project’s builder (whoever that turns out to be).<sup>69</sup>

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<sup>68</sup> See Link Union Station – Draft EIR, Executive Summary, pp. ES-xlviii to ES-xlix, available at: <http://libraryarchives.metro.net/DPGTL/eirs/Link%20Union%20Station/2019-link-union-station-draft-eir-executive-summary-english.pdf>.

<sup>69</sup> In public statements, both ARTT LLC and Climate Resolve claim the Project will be donated to a new nonprofit, Zero Emissions Transit, which similarly has no experience building anything. See <https://www.laart.la/faq/> and <https://www.climateresolve.org/climate-resolve-launches-new-nonprofit-focused-on-zero-emission-transit-dodger-stadium-aerial-gondola-to-be-first-project/> (both last viewed Jan. 14, 2023). But in a sworn declaration of October 5, 2022, Principal Deputy Counsel, Ronald W. Stamm, Metro’s counsel of record in recent litigation asserted that “ARTT’s rights and obligations under [its agreement with Metro] cannot be assigned unless and until Metro approves the assignment...” and “[n]o assignment has been proposed yet.” (LA Sup. Ct. Case No. 22STCP01030, Declaration of Ronald W. Stamm in Support of Respondent’s and Real Party’s Joint Opposition to Motion to Augment the Record and File a First Amended Petition, par. 10, filed Oct. 6, 2022.)

GO14-148

GO14-149

Here, knowing of contaminated groundwater conditions very likely to exist in the Project area, Metro does not propose further groundwater testing of Project component areas to understand whether there *will* be a significant impact. Instead, Metro proposes deferring action until such time as hazardous conditions (i.e., significant impacts of the Project) are stumbled across during construction, long after the final EIR is certified. This is not permitted under CEQA. (CEQA Guidelines, § 15126.4, subd. (a)(1)(B).) The Project’s mitigation measures should include pre-certification groundwater testing to understand the scope of potential impact and if determined to be significant, a pre-construction mitigation that lessens the impact to a level less than significant must be imposed.

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GO14-149

#### **H. Land Use and Planning Conflicts are Significant and Unavoidable.**

In its land use and planning analysis the DEIR states the Project will have a significant environmental effect because it conflicts with the General Plan of the Los Angeles State Historic Park, but that this impact can be made less than significant with the imposition of mitigation measure LUP-A (“Obtain a Los Angeles State Historic Park General Plan Amendment”) to allow “transit uses” within the Park. (DEIR, pp. ES-58, 3.11-38.) But a General Plan amendment to permit this Project within LA State Historic Park is a legal impossibility. The proposed mitigation measure to obtain a General Plan amendment is for an activity that state law expressly prohibits in a California state park historic unit. (See discussion, *supra* pp. 12-26.) Here, Metro should have determined the proposed mitigation was legally infeasible. When a lead agency makes this determination, a mitigation measure need not be proposed or analyzed. (CEQA Guidelines, § 15126.4, subd. (a)(5).) There is no mitigation to lessen the impact, which is therefore significant and unavoidable.

GO14-150

The significant and unavoidable impact is fatal to the Project’s hope to use any portion of LA State Historic Park for a Project component or part of its aerial alignment. But this is not the only significant environmental effect from land use and planning conflicts that the DEIR fails to properly identify and analyze.

#### **1. The Project conflicts with the General Plan of El Pueblo de Los Angeles, which the City of Los Angeles must follow.**

El Pueblo de Los Angeles Historical Monument “is a national and state registered Historical Monument and City-designated Historic-Cultural Monument located in downtown Los Angeles directly west of LAUS. El Pueblo is historically significant as the birthplace of the City of Los Angeles, established in September 1781 by settlers from present day northern Mexico.” (DEIR, p. 2-8.) El Pueblo includes a number of important historical structures, including “the Avila Adobe, the City’s oldest surviving residence; Pico House, built by the last governor of California under Mexican rule, and the City’s first grand hotel; the Plaza Firehouse, the City’s first firehouse; and Our Lady Queen of Angels Catholic Church, the City’s oldest church and the only building at El Pueblo still used for its original purpose.” (*Id.*)

GO14-151

As the DEIR notes, El Pueblo was originally El Pueblo State Historic Park, a historic unit of California’s state park system created in 1953. (DEIR, p. 3.5-7.) It was transferred to the City



of Los Angeles, and in 1992 a new City Department, El Pueblo de Los Angeles Historical Monument Authority Department (“El Pueblo Department”), was created to operate, manage, maintain, and control El Pueblo. (LA Admin. Code (“LAAC”), Ch. 25, art. 1, § 22.620.) The Department is overseen by the El Pueblo de Los Angeles Historical Monument Authority Commission (the “Board”). (LAAC, § 22.621.) The Board has the “power and authority to approve street lights, street and sidewalk surfaces, fixtures and other appliances and furnishings proposed to be located in or on the sidewalks, streets and ways immediately adjoining the Monument in order to maintain and enhance the ambiance and character of the Monument.” (LAAC, § 22.626.) The Board may “enter into contracts for services and leases as it deems necessary for the operation, management, maintenance and control of the Monument” within certain express limitations, but neither the Board nor Department have any power to “to acquire or sell any real property for or on behalf of itself or of the City.” (LAAC, §§ 22.627, 22.632.) The Board may not approve “master plans, development plans, and amendments thereto” without prior approval of the Los Angeles City Council and Mayor. (LAAC, § 22.634.)

GO14-151

The DEIR also notes the existence of El Pueblo’s General Plan and the El Pueblo Department’s El Pueblo de Los Angeles Strategic Plan, which “has as one of its objectives ‘historic and asset management’” with a goal to “continue to implement and adhere to El Pueblo’s General Plan by restoring and renovating properties to their highest and best use.” (DEIR, p. 3.5-8.)

The DEIR fails to mention, however, that the City’s acquisition of El Pueblo from the State of California came with specific deed restrictions that limit the City’s actions with respect to permissible uses of El Pueblo land it acquired and holds in public trust for the people of the City and California.<sup>70</sup> The Quitclaim Deed restrictions require El Pueblo’s development and operation to conform to its April 11, 1980, General Plan. While the City may amend the El Pueblo general plan, in doing so the City “*shall* consider the development criteria of Section 5019.59 of the Public Resources Code.” (Quitclaim Deed, condition subsequent no. 1, pp. 1-2.) This statute explicitly limits what can be constructed in a state historic park: “*The only facilities that may be provided* [in a state park historic unit] are those *required* for the safety, comfort, and enjoyment of the visitors, such as access, parking, water, sanitation, interpretation, and picnicking.” (Pub. Res. Code, § 5019.59 (emphasis added).) Failure to follow the Quitclaim Deed’s express restrictions allows a right of reversion to the State. (Quitclaim Deed, p. 2.) The DEIR fails even to mention these strict land use limitations.

GO14-152

The DEIR describes use of El Pueblo land necessary to construct Alameda Station:

Vertical circulation elements (i.e. elevators, escalators, stairs) for pedestrian access, which would also serve as queuing areas to the station, would be introduced at-grade north of the Placita de Dolores in a proposed new pedestrian plaza at El Pueblo on the west in an area currently used as a parking and loading area for El Pueblo.

GO14-153

FN GO14-153 <sup>70</sup> Quitclaim Deed between State of California and City of Los Angeles for El Pueblo de Los Angeles Historic Monument (“Quitclaim Deed”), executed Oct. 27. 1988, attached as **Exhibit T**.

(DEIR, p. 2-23.)

These “vertical circulation elements” would be located on land within El Pueblo’s boundary that is subject to its General Plan. Since the City must follow the mandate of Public Resources Code section 5019.59, which restricts permissible facilities at El Pueblo to only those “required for the safety, comfort, and enjoyment of the visitors” it may not construct any portion of the Project within the El Pueblo de Los Angeles Historical Monument boundary. The DEIR’s failure even to provide basic background information regarding this significant environmental impact due to a clear conflict with the El Pueblo General Plan, let alone any proposed mitigation measure to lessen its significance requires the DEIR to be revised and recirculated.<sup>71, 72</sup>

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GO14-153

**2. The Project conflicts and is inconsistent with numerous land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating environmental effects.**

The DEIR asserts the proposed Project is subject to numerous land use plans, policies, and regulations, including, but not limited to (DEIR, pp. 3.11-37 to 3.11-38):

- Los Angeles State Historic Park General Plan
- Dodger Stadium Conditional Use Permit
- City of Los Angeles General Plan, including several community plans
- City of Los Angeles RIO District Ordinance
- Cornfield Arroyo Seco Specific Plan

GO14-154

The DEIR performs a conclusory analysis of the above and other land use plans, policies, and regulations (see Tables 3.11-1 through 3.11-6, DEIR, pp. 3.11-39 to 3.11-73) and concludes that the only land use conflict requiring mitigation is the Project’s acknowledged conflict with the LA State Historic Park General Plan. (DEIR, p. 3.11-77.) As discussed above, the Project conflict with LA State Historic Park is significant and unavoidable, and the proposed mitigation to paper over the conflict is legally infeasible. (See discussion, *supra* pp. 12-26.) Likewise, the

<sup>71</sup> This assumes a mitigation is possible. As with the Project’s similar conflict with LA State Historic Park’s General Plan, the impact appears to be significant and unavoidable. (See discussion, *supra* p. 25.)

<sup>72</sup> For the record, LA Parks Alliance notes a discrepancy between an *illustration* of El Pueblo found in the 2016-2020 Strategic Plan and the *actual El Pueblo park boundary* as the park was accepted by the City from the State of California. Page four of the Strategic Plan appears to show a small triangular cutout of El Pueblo’s boundary along Alameda Street, adjacent to the Old Winery, Avila Adobe, and Placita de Dolores locations at the Historic Monument. The true park boundary as indicated on the 1980 General Plan applicable to the property and as accepted by the City has no such triangular cutout. See Quitclaim Deed, Exhibit “B” Sheet 1, pdf. p. 13; see also El Pueblo General Plan, pdf p. 6 (El Pueblo de Los Angeles State Historic Park, Drawing No. 17269, “Project Description & Vicinity”). The El Pueblo boundary along Alameda adjacent to the Project is a continuous straight line with no triangular cut out. Even if the City could provide this surplus land to the Project, SMMC has a right of first refusal under Public Resources Code section 33207(b.) (See discussion, *supra* pp. 6-8.)

proposed mitigation for the Project’s equally clear conflict with the El Pueblo General Plan is also legally infeasible. (See discussion, *supra* pp. 73-75.)

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GO14-154

Without more it is evident that the Project has significant and unavoidable environmental impacts within the land use and planning analysis category. Nonetheless, this letter will briefly touch on some of the more obvious conflicts between the Project and other plans, policies, and regulations discussed in the DEIR.

GO14-155

LA Park’s Alliance notes that the land use consistency analysis includes many speculative and unsupported claims already mentioned above. For example, and as discussed above, the DEIR repeatedly describes the speculative use of Dodger Stadium Station as an access point for communities adjacent to Dodger Stadium as a Project feature even though that permissive use would require future consideration and is not guaranteed to occur or remain available, the DEIR’s ridership study is entirely speculative and not based on actual data, and the Project itself is not guaranteed to operate every day (as discussed, it will run according to demand, perhaps not at all) and provides priority to Dodger Stadium event ticket holders. The DEIR also repeats that the travel time from Union Station to Dodger Stadium with the Project is only seven minutes, neglecting to provide any estimate of the total time including queueing/waiting, which is the far more relevant consideration. Any consistency analysis relying on these speculative, unsupported, and incomplete claims is necessarily misleading and inadequate.

GO14-156A

GO14-156B

In addition, because the Project fails to consider the foreseeable development of parking lot areas around Dodger Stadium, any consistency analysis with respect to public services within the City of Los Angeles General Plan (especially its Framework and Land Use Elements) is incomplete and inadequate. These would include plans, goals, policies, and objectives related to police and fire service, parks, libraries, schools, and the like.

GO14-157

### **Los Angeles State Historic Park General Plan**

The DEIR asserts that the “The proposed Project would provide recreation opportunities in coordination with the regional recreation network by providing a connection from the Los Angeles State Historic Park to other local transit lines along the Project alignment and the regional transit system accessible at LAUS...” (DEIR, p. 3.11-39.) The Project is not itself a recreational facility, it is a private transit facility, primarily intended to move people from LA Union Station to Dodger Stadium. Though if the Project were built users could theoretically take it to LA State Historic Park, there is no substantial evidence that people will do so, because a robust public transit system already serves the Park. Ridership studies for the Project are speculative, as are Project features to allegedly transport persons to the Park, to Elysian Park, and elsewhere other than on game days, when Dodger Stadium ticket holders will have priority.

GO14-158

The DEIR asserts: “The proposed Project would not interfere with the passive uses currently enjoyed at the Los Angeles State Historic Park. The proposed Project’s aerial clearance would allow the continued use of the park, with certain limitations.” (*Ibid.*) The second sentence negates the first. If limitations are placed on the Park’s use, the Project necessarily interferes with the Park. In fact, the Project would take well over an acre of the Park for private use, not including the remainder parcel created by the Project alignment’s intrusion at the western side of

the Park. Park activities in the area of the gondola will be changed, including for major events, when event stages will be forced to find a new location in the Park (causing foreseeable significant indirect physical changes that have not been analyzed in the DEIR).

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GO14-158

The DEIR’s assertions regarding consistency with the Park’s aesthetic goals are adequately addressed elsewhere in this letter. The Project clearly does *not* “[p]rotect and enhance scenic viewsheds and features and preserve the visitor’s experience of the surrounding landscape by minimizing adverse impacts to aesthetic resources.” (DEIR, p. 3.11-39.) It does exactly the opposite, harming vital aesthetic, cultural, and historic resources that are protected by the Park’s General Plan and Final EIR document.

GO14-159

The DEIR asserts that the Project’s proposed park amenities would be a visitor benefit. (DEIR, p. 3.11-41.) The Park already has adequate concessions and other park amenities and the proposed amenities are not necessary, and would largely serve to replace existing facilities the Project would destroy. Thus, the DEIR’s assertions regarding Park Facilities Goals are specious – but for the Park’s destruction of existing facilities, development of replacement facilities would not be necessary. Project facilities are *not* Park facilities, they would merely be located within the Park. Under Public Resources Code section 5019.59, however, they are not permitted. Similarly, the Project is *not* consistent with the Park’s Education and Interpretation Goal since the Park’s goals do not relate to interpretation of non-Park structures and facilities. That the massive Chinatown/State Park Station might include an exhibit, display, public art, or interpretive display does not diminish the negative impact of its unlawful intrusion.

GO14-160

As already discussed, the Project does not assist the Park in meeting its Access and Circulation Goal. The Park’s existing access is sufficient to welcome pedestrians, cyclists, and a small number of vehicles. Public transit access is readily available through Metro’s nearby Gold Line station and on public bus lines. The Project would not “create a sense of entry and arrival at the Park” (DEIR, p. 3.11-42), it would completely obscure the Park’s existing entry. (See discussion and images, *supra* p. 60.) Further, additional access is *not required*, and the DEIR provides no substantial evidence to support that a significant number of people would use the Project for the purpose of traveling to the Park. Per the DEIR’s *own study*, at most 10% of visitors to special events *might* use the gondola to arrive, meaning 90% of visitors will not experience the “sense of entry” the Project would impose in achieving its true objective.

GO14-161

### **Dodger Stadium Conditional Use Permit**

The DEIR asserts that the Project is consistent with the Dodger Stadium Conditional Use Permit. (DEIR, 3.11-43.) But the DEIR provides analysis of exactly two of the CUP conditions (conditions 1 and 3). (*Ibid.*) Elsewhere, the DEIR describes that a Plan Approval for the Conditional Use Permit is necessary, while adding that condition 4 of the CUP provides for “collaboration ‘in devising mass transportation service to the Stadium site...’” (DEIR, 2-62.) The consistency analysis describes no conflict with the CUP. But there logically must be a conflict, or at least a potential conflict, or no Plan Approval would be necessary. The DEIR’s consistency analysis is therefore incomplete and inadequate for failing to provide the necessary information to determine whether the Project is or is not consistent with the CUP.

GO14-162

### City of Los Angeles – Framework Element

The consistency analysis with the City of Los Angeles Framework Element is notable more for what it leaves out of the analysis than what it includes. The DEIR asserts that the Project is consistent with Objective 6.2 of chapter of the Framework Element. (DEIR, p. 3.11-49.) While the Project theoretically would add an additional *private* transit option to transport persons from Union Station to LA State Historic Park (when it is running and not prioritizing Dodger Stadium event patrons), the DEIR provides little evidence a significant number of persons will use it instead of the existing and readily available Metro Gold Line, bus lines, or other options such as walking or riding a bicycle. The proposed Project’s consistency with Objective 6.2 is therefore speculative. Consistency with the Framework Element’s Transportation policy is similarly deficient.

GO14-163

The Framework Element consistency analysis omits Objective 3.17: “Maintain significant historic and architectural districts while allowing for the development of economically viable uses.” (Framework Element, Chapter 3.)<sup>73</sup>

The Framework Element consistency analysis omits discussion of Goal 6A and Objective 6.1, which are particularly relevant to the numerous parks adversely impacted by the Project, particularly LA State Historic Park.

Framework Element Goal 6A: “An integrated citywide/regional public and private open space system that serves and is accessible by the City’s population and is *unthreatened by encroachment from other land uses.*”

GO14-164

Framework Element Objective 6.1: *Protect the City’s natural settings from the encroachment of urban development*, allowing for the development, use, management, and maintenance of each component of the City’s natural resources to contribute to the sustainability of the region. (Framework Element, Chapter 6.)

The DEIR’s reliance on speculative and unsupported claims and omission of highly relevant goals and objectives causes the Framework Element consistency analysis to be invalid.

### Central City Community Plan

Within the Project area, the Central City Community Plan touches only El Pueblo de Los Angeles Historical Monument, so it is only nominally relevant to the Project, and is largely superseded by land use regulations of the El Pueblo General Plan, with which the Project is clearly inconsistent. (See discussion, *supra* pp. 73-75.) As discussed above, the consistency analysis relies on speculative and unsupported claims regarding Project availability to community members and Project ridership and is therefore invalid. With respect to connections

GO14-165

FN GO14-164<sup>73</sup> The City of Los Angeles Framework Element is currently available at: <https://planning.lacity.org/plans-policies/framework-element> (last viewed Jan. 14, 2023).

to LA State Historic Park, the Project allegedly provides a transit connection that is duplicative of existing robust public transit options, walking, and cycling.

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GO14-165

As in the Framework Element, the Central City Community Plan Element leaves out important objectives and policies. The analysis is incomplete without considering Objective 9.2: “To provide the requisite services, housing opportunities, and community environments to allow the homeless to rejoin the workforce and lead more productive lives.” The Project seeks to utilize City surplus land that would be better used for development of affordable housing and job creation and is known to conflict with longstanding community development plans in the area of the Project’s Alameda and Alpine Towers. The Project is not only inconsistent with but blocks the attainment of Objective 9.2.

The Central City Community Plan also includes Objective 11-7: “To provide sufficient parking to satisfy short-term retail/business users and visitors but still find ways to encourage long-term office commuters to use alternate modes of access.” Objective 11-8: “To *evaluate, study and monitor current parking policies to assess parking demand as a result of changes in development trends*, the growing downtown residential community and the *general intensification of land use* in the Central City area as surface parking lots become developed with other uses.” As discussed elsewhere, the claimed benefit of high rate of public transit use for the Project and removal of vehicles from Project area roadways is speculative and highly inflated.<sup>74</sup> Legitimate fears of gondola users driving downtown and inundating the neighborhoods around Union Station and the LA State Historic Park have been a concern of community members since the Project was first made public. The DEIR’s failure to address these legitimate concerns, which are consistent with issues identified in the Central City Community Plan by providing even a cursory analysis of the Project’s consistency with Objectives 11-7 and 11-8 is puzzling.

GO14-166

### Central City North Community Plan

The Central City North Community Plan consistency analysis relies on the same speculative and unsupported claims regarding Project availability to community members and Project ridership as the Central City Community Plan and is likewise invalid. The Project’s transit connection with LA State Historic Park is duplicative of existing options and there is no substantial evidence of a need for the service for that purpose.

GO14-167

The discussion of Goal 12 (“Encourage alternative modes of transportation to the use of single vehicle occupant trips...”) is curious, since the primary purpose of the Project is transporting Dodger Stadium game and event patrons, and the average number of persons per vehicle to Dodger Stadium is 3.6.<sup>75</sup> The primary purpose of the Project would thus not reduce single vehicle occupant trips. (This point is equally applicable to Silver Lake-Echo Park-Elysian Valley Community Plan Goal 11, which is identical to Central City North’s Goal 12.)

FN GO14-166<sup>74</sup> See UCLA Mobility Study, *supra* p. 48 fn. 47 (Exhibit P).

FN GO14-167<sup>75</sup> See UCLA Mobility Study (Exhibit P), p. 3; accord, Dodger Stadium Conditional Use Permit (DEIR, p. 3.11-43).

Relevant Objectives and supporting policies omitted from the Central City North Community Plan consistency analysis include Objective 1-4: “To promote and insure the provision of adequate housing for all persons regardless of income, age, or ethnic background.” As in the consistency analysis of the Central City Community Plan with its Objective 9-2, the Project is not consistent with this objective since it seeks to take City surplus land in the Community Plan area very well suited to the development of affordable housing and conveniently located near existing public transit options. The Project is also not consistent with Goal 4 and Objective 4-1, which calls for the conservation of existing recreation and park facilities. The Project would reduce available park space at LA State Historic Park by well over an acre before considering the loss of the remainder parcel to the west of the proposed Project alignment. Similarly, the Project is not consistent with Goal 5 and Objective 5-1, “[t]o *preserve existing open space resources...*” (Emphasis added.)

GO14-168

Finally, there can be no doubt that a consistency analysis with the Central City North Community Plan cannot be considered complete without a serious discussion of Goal 17 and its supporting Objective 17-1: “To *ensure that the Community’s historically significant resources are protected, preserved, and/or enhanced.*”

GO14-169

### **“RIO” River Improvement Overlay District**

While LA Parks Alliance does not believe the Project is consistent with the RIO District, and the consistency analysis relies largely on speculative, unsupported, and incomplete information, the primary conflict with RIO that is not adequately discussed in the DEIR is with respect to the potential for light intrusion, particularly from potential electronic digital displays that are described as possible for gondola cabins. The consistency analysis should therefore be revised and recirculated for additional public review and comment.

GO14-170

### **Cornfield Arroyo Seco Specific Plan**

The Project seeks an exception from the Cornfield Arroyo Seco Specific Plan (“CASP”) and to create a Specific Plan to benefit the project and relieve it from otherwise applicable City of Los Angeles zoning regulations and to allow construction of the Chinatown/State Park Station. (DEIR, p. 3.11-63.) Though the DEIR asserts that “the provision of a station at this location would be consistent with the overall intent of the CASP...” (*ibid.*) that is a legal impossibility. If the Project were consistent with the CASP it would not need an exception to the CASP. (In the City of Los Angeles a specific plan “exception” is essentially equivalent to a variance.)

GO14-171

### **I. The Failure to Mitigate Temporary Loss of Access to Substantial Portions of LA State Historic Park is Impermissible.**

The DEIR notes that “[c]onstruction of the Chinatown/State Park Station would require the temporary closure of approximately 1.59 acres of the southern entrance to Los Angeles State Historic Park during the approximately 19 months for the construction of the Chinatown/State Park Station.” (DEIR, p. 3.16-16.) The DEIR finds the closure is not significant, justifying its

GO14-172

conclusion by comparing loss of this land to park patrons for more than a year and a half to the Park’s occasional closure for special events. The comparison is inapt. The DEIR’s conclusion does not evince that the determination was made using “careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data.” (CEQA Guidelines, § 15064, subd. (b)(1).)

Though not offered in mitigation, since the DEIR has determined the loss is not significant, Metro essentially suggests park visitors can just suck it up—go someplace else, use some other part of the Park, or perhaps just skip going to local parks until the Project is complete. This is unacceptable, especially in light of the identified significant and unavoidable noise impacts to the Park, for which no mitigation has been identified.

The DEIR is inadequate for failing to adequately analyze whether the temporary loss of 1.59 acres of LA State Historic Park near its southwest entrance is significant, and if it is significant, for failing any attempt to mitigate the significant impact.

**J. The Project Alternatives Section Must be Revised to Include Additional Feasible Alternatives, Including a Revised TSM Alternative.**

The DEIR identifies the Transportation Systems Management (TSM) Alternative as the Environmentally Superior Alternative, but goes to great lengths to argue the alternative meets too few project objectives to be worthy of consideration.

But this is only because the project alternatives are constrained by artificially narrow project objectives. (See discussion, *supra* pp. 43-46; see also *WATER*, 78 Cal.App.5th at 692.) Of the objectives the DEIR asserts the TSM alternative does not meet, four are the result of project objectives plainly chosen to favor the aerial rapid transit system over other feasible alternatives, defining the feasible TSM alternatives out of consideration (these are objectives 2, 7, 8, and 12). The DEIR’s support for its conclusion that the preferred alternative meets two others is largely speculative, not based on substantial evidence, and the result of ignoring reasonably foreseeable indirect changes in the environment due to the project (these are objectives 5 and 9). The remaining two objectives could easily be met by the TSM Alternative with only minor modifications (objectives 10 and 11). (In fact, it is unclear why Metro would not attempt to meet objective 11 in *all* transportation projects it considers—why would it purposely design a project alternative in a way that doesn’t attempt to minimize the alternative’s environmental footprint?)

The TSM Alternative’s design suffers from a conveniently terrible lack of imagination considering it is proposed by one of California’s largest public transportation agencies, serving the largest county (by population) in the United States, for a project that was initially proposed to Metro’s “Office of Extraordinary Innovation.”

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GO14-172

GO14-173



The TSM Alternative should be minimally revised:

- To travel not only from LA Union Station, but from other sites Metro identifies as appropriate collection points (noting that the current DSE already operates a line directly from the South Bay);
- To use electric buses, which would eliminate GHG emissions in the Project area, the same as the preferred alternative.

Additional benefits of the revised TSM Alternative would be an expanded fleet of electric buses, which would not be required to travel within only the Project area, but which could be readily available for other uses when not needed for transit to Dodger Stadium games and events. These uses have the potential to greatly reduce VMT and GHG not only within the Project area, but over the entire Metro service area.

Other feasible alternatives to consider are included in the 1990 LACTC Study. (See discussion, *supra* p. 42 fn. 43 (Exhibit O).) Particularly worthy of consideration is the escalator/walkway option, which has a very large capacity (approaching half of the stadium capacity), relatively low cost, and low total travel time (including waiting and boarding). (Id., pdf. p. 7.)

## CONCLUSION

Based on all of the above and on other comments and objections by others incorporated by reference herein, the Draft Environmental Impact Report must be revised and recirculated or the Project must be withdrawn from consideration and the environmental review terminated.

Thank you for your consideration of these comments.

Sincerely,



John Given

Enclosures

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GO14-173

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# EXHIBIT A

Exhibit A is related to Comment GO14-6. This Exhibit material was considered in the Response to Comment GO14-6.

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February 26, 2021

*Via email to LAART@metro.net*

Corey Zelmer  
Deputy Executive Officer  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Mail Stop 99-2-6  
Los Angeles, CA 90012

RE: Los Angeles Aerial Rapid Transit Project  
SCH 20201000007

Dear Mr. Zelmer:

This letter is submitted on behalf of Arts District Community Council LA (“ADCCLA”) with respect to the above-captioned Los Angeles Aerial Rapid Transit Project (the “Project”), for which Los Angeles County Metropolitan Transportation Authority (“Metro”) is acting as lead agency for the Project’s environmental review.<sup>1</sup> ADCCLA contends that the Notice of Preparation (“NOP”) circulated for the Project by Metro on October 1, 2020 is legally inadequate and the only appropriate remedy is for Metro to revise the inadequate NOP and recirculate with a new review and comment period for responsive and trustee agencies and members of the public.

The *minimum* legal requirements for an NOP are very clear:

The notice of preparation shall provide the responsible and trustee agencies, the Office of Planning and Research and county clerk with *sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response*. At a minimum, the information shall include:

- (A) Description of the project,
- (B) Location of the project (either by street address and cross street, for a project in an urbanized area, or by attaching a specific map, preferably a

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<sup>1</sup> ADCCLA is a 501c3 non-profit organization made up of a coalition of community stakeholders whose goal is to preserve, protect and enhance the neighborhood it serves. ADCCLA’s mission includes providing information, services, and opportunities to participate in rendering a true urban community with an emphasis on green solutions, enhancing and promoting art in the neighborhood and encouraging stakeholder participation. (See <https://www.adccla.org>.)

copy of a U.S.G.S. 15' or 7 1/2' topographical map identified by quadrangle name), and

(C) *Probable environmental effects of the project.*

(Cal. Code Regs., tit. 14 (hereafter “CEQA Guidelines”), § 15082, subdiv. (a)(1) (emphasis added).)

The Project NOP circulated by Metro is inadequate because it does not provide “sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response.” It also fails to provide sufficient information about the “[p]robable environmental effects of the project.” (*Id.*)

The NOP consists of only eight pages, the first three and a half pages of which consist of text, a significant portion of which is boilerplate explanation of basic CEQA concepts and requirements, as well as a public hearing notice and the lead agency’s contact information for the Project. The first page provides a general description of the proposal submitted by Los Angeles Aerial Rapid Transit Technologies LLC to Metro for an aerial tram project to connect Los Angeles Union Station to Dodger Stadium. (NOP, p. 1.)

The first page also includes a basic project description, describing the proposed aerial tram alignment as traveling “generally along Alameda Street, Spring Street, and Bishops Road from LAUS to Dodger Stadium.” (*Ibid.*) The project description continues: “The proposed Project includes options for an intermediate station to provide additional transit service adjacent to the Los Angeles State Historic Park and the location where the proposed Project flies over portions of the Park (the Spring Street Alternative and Broadway Alternative).” In its totality, this vague project description does not make clear to a reader of the NOP that there is *no* proposed alternative other than the “no-project” alternative which will not significantly and adversely impact LA State Historic Park.

The second page of the NOP begins by referencing the final four non-textual pages of the NOP. (*Id.*, p. 2.) Figure 1 shows a regional map of Los Angeles County with a centrally located dot and label indicating the approximate location of the project within the county. (*Id.*, p. 5.) Figures 2 and 3 show the two alignment variations of the one project alternative presented. (*Id.*, pp. 6-7.) Figure 4 shows photos of a number of aerial trams in use around the world. While perhaps helpful to a reader entirely unfamiliar with aerial trams, the photographs seem of quite limited value in the context of assisting responsible agencies, trustee agencies, and members of the public in assessing the potentially significant environmental impacts of *this* Project in order to make meaningful responses to the NOP. For example, Figure 4 does not suggest that any of the aerial trams depicted are of the particular type under consideration for the Project, does not show how tall the proposed aerial tram’s towers might be, or where they might be located along either of the proposed project variation’s alignments.

Page two of the NOP continues with the “Project Location and Environmental Setting,” which generally describes the physical location and land uses in the area of the proposed Project. (*Id.*, p.

2.) Again, the NOP vaguely suggests there may be no direct impact on LA State Historic Park in describing that the flyover of the park would be “in connection with providing additional transit service *adjacent* to the Los Angeles State Historic Park.” This confusing statement easily misleads an uninformed reader. One very reasonable interpretation of the text is that if the optional adjacent station is not included as part of the Project then the aerial tram might not cross directly through the park’s airspace at all. The ambiguous statement fails to assist, and arguably impedes, responsible and trustee agencies and interested park stakeholders and other members of the public in making informed comments about the Project to the lead agency.<sup>2</sup>

The NOP continues with a statement of the Project’s purpose, nominally “to expand mobility options for transit riders through a permanent direct transit connection between [Union Station] and Dodger Stadium, a regional event center, via an aerial gondola system.” (*Id.*) The Project purports to have “potential to increase transit access for open space, parks, and the surrounding communities by linking to the Los Angeles State Historic Park, Elysian Park, and the region’s rapidly growing regional transit system at [Union Station].” (*Ibid.*)

Conspicuously absent from the NOP’s discussion of potential future uses of the aerial tram is its use in connection with likely future development of the 260 acres around Dodger Stadium owned by McCourt Global, the very owner of the aerial tram development company.<sup>3</sup> “CEQA ‘cannot be avoided by chopping up proposed projects into bite-size pieces’ which, when taken individually, may have no significant adverse effect on the environment. [Citations.]” (*Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1223.) In addition, CEQA recognizes that transportation projects, in particular, may have growth-inducing impacts separate and apart from later project phases and requiring analysis. (See, e.g., *Napa Citizens for Honest Govt. v. Napa County Bd. of Supervisors* (2001) 91 Cal.App. 4th 342.)

The Project EIR should undertake a serious study of the aerial tram Project’s potentially significant impacts in connection with the obviously foreseeable commercial and residential growth at the 260-acre McCourt Global property in Chavez Ravine.<sup>4</sup> McCourt Global LLC’s

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<sup>2</sup> To be clear, even if the aerial tram did not directly cross LA State Historic Park, its adjacency would still significantly and adversely impact the park.

<sup>3</sup> “McCourt currently co-owns 260 acres of land at Chavez Ravine in Los Angeles, the home of Dodgers Stadium. *Among other plans for the area*, McCourt will develop a cutting-edge aerial tramway from Los Angeles Union Station to Dodgers Stadium through its company, Aerial Rapid Transit Technologies.” See McCourt Global LLC’s real estate webpage, available at: <https://www.mccourt.com/real-estate-overview> (last checked: Feb. 25, 2021) (emphasis added).

<sup>4</sup> It is unfortunately very common for major development projects to be undertaken in piecemeal fashion, which is a fundamental violation of the California Environmental Quality Act. Under CEQA, a “project” is “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” (CEQA Guidelines, § 15378(a); see *County of Ventura v. City of Moorpark* (2018) 24 Cal.App.5th 377, 385: where multiple “activities are ‘part of a coordinated endeavor,’ ‘among the ‘various steps which taken together obtain an objective,’ ’ or otherwise

future plans for its large Chavez Ravine site are clearly alluded to at its website (see footnote 3). Even if McCourt Global's plans are not currently available in significant detail, they should be disclosed at least in broad scope so potentially significant impacts of the entirety of the *true* long-term project do not escape review at the earliest time, or the EIR will have to make broad assumptions about the potentially significant foreseeable indirect impacts in order to avoid the harms of piecemealing. Metro should carefully consider whether it is even appropriate for environmental review for the aerial tram Project to proceed if the whole of the project has not been fully disclosed by Aerial Rapid Transit Technologies LLC or McCourt Global LLC.

The discussion of project alternatives is limited to two basic alternatives: the “no-project” alternative, and two variations of an alternative with an alignment from Union Station down Alameda Street and Spring Street. The first variation (the “Spring Street Alternative”) continues northeast on Spring Street before it transects LA State Historic Park roughly in the middle of the park. (NOP, pp. 2, 6.) The other variation (the “Broadway Alternative”) continues down Spring Street to the southwest corner of LA State Historic Park, then crosses over the western edge of the park, and turns northwest on Bishop Road after leaving the park and crossing Broadway. (NOP, pp. 2, 7.) Both variations of the one alternative directly impact the park by disrupting the integrity of the park's airspace. There is no alternative offered other than the “no-project” alternative that does not directly and significantly impact LA State Historic Park.

Notwithstanding the obvious potentially significant impacts to LA State Historic Park alone, the NOP does not include a summary of the “[p]robable environmental effects of the project.” (CEQA Guidelines, § 15082, subdiv. (a)(1).) Instead, the NOP merely lists the 20 environmental analysis categories from CEQA Guidelines Appendix G that will be later analyzed within the draft Environmental Impact Report, and notes that “[m]itigation measures to reduce potentially significant impacts during construction and operation of the proposed Project will also be identified in the Draft EIR.” (NOP, p. 3.) The NOP does not disclose which, if any, of these analysis categories may have significant environmental impacts, whether such impacts are capable of being mitigated, what such mitigations might include, or if there could be significant and unavoidable impacts requiring a statement of overriding considerations in order for the Project to receive approval. (*Ibid.*)

The rest of the NOP consists of a notice for the planned scoping meeting, held on October 22, 2020, and instructions to submit public comments.

A common method used by lead agencies to catalog the “probable environmental effects of the project” is to publish an “initial study” as part of the NOP. (See CEQA Guidelines, § 15063(c)(3), noting the purposes of the initial study include “assist[ing] in the preparation of an EIR if one is required” by, *inter alia*, “[f]ocusing the EIR on the effects determined to be significant” and “[i]dentifying the effects determined not to be significant.”) While CEQA does not require that an initial study be prepared if it is evident that an EIR will be necessary, the absence of an initial study does not excuse the lead agency from including the probable

---

‘related to each other,’ they constitute a single project for purposes of CEQA.” [Citations omitted].)

environmental effects of the project as part of the NOP. (CEQA Guidelines, § 15060(d); see also CEQA Guidelines, § 15063(a): “If the lead agency can determine that an EIR will clearly be required for the project, an initial study is not required *but may still be desirable*.” (Emphasis added.)) Listing broad environmental analysis categories is no substitute for the required disclosure of probable environmental effects resulting from the Project.

The NOP fails to include any information about the Project’s “probable environmental effects,” and therefore does not “provide the responsible and trustee agencies, the Office of Planning and Research and county clerk with sufficient information describing the project and the potential environmental effects to enable the responsible agencies to make a meaningful response.” (CEQA Guidelines, § 15082.) The NOP does not mention or summarize, even in a cursory way, the nature of project approvals, permits, easements, leases, air rights, or other entitlements that will be required for the Project, which necessarily needs these many approvals to use the public rights of way and public and private airspace to be constructed. It is evident that certain public resources are affected by the Project (the various public rights of way, the LA State Historic Park), but it is not immediately obvious what approvals to utilize these resources are needed, or what the environmental effects on these resources might be. The NOP does not list the state and local responsible agencies expected to have oversight or approval authority for approvals or decisions, or the trustee agencies charged with protecting natural resources affected by the Project. The NOP does not identify public resources directly or indirectly impacted by the Project, whether impacts can be mitigated, or what potential mitigations might be considered.

These many informational failures frustrated members of the public, including members of ADCCLA, from providing their informed comment to the lead agency. The NOP is therefore inadequate, and a revised NOP including the information required by law should be recirculated and a new comment period provided.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Given', with a long horizontal flourish extending to the right.

John Given

# EXHIBIT B

Exhibit B is related to Comment GO14-10. This Exhibit material was considered in the Response to Comment GO14-10.





WE INVEST IN BETTER

---

# **We are building a new model of enterprise that maximizes value by integrating financial results and social impact**

## **RECENT NEWS:**

Frank McCourt: Tech's Super League Is Already Here

What went wrong with the Super League

Statement from Frank McCourt Regarding Proposed European Super League

## **Our Company**

## Who We Are

We are an investment firm redefining value by integrating financial results and social impact. McCourt creates powerful partnerships to discover new opportunities and innovative ideas that strengthen the communities in which we work. We break through the old silos that separate business from people to create inclusive networks that benefit all stakeholders.

Our team come from diverse backgrounds across industry, government, and social impact. We seek and cultivate personalities with the boldness to think outside the box and suggest imaginative ideas; the entrepreneurship that brings passion to building something great; the adaptability to grow and evolve to meet a changing world; the humility that helps us learn from both triumph and failure; the results-orientation that drives success in the face of challenges; and the generosity that defines the spirit of our commitment to our people, partners, and communities.

## What We Do

We are guided by our mission, “We invest in better, building a better business and better world,” which underscores our commitment to integrate business with impact. We apply this to our entire portfolio, which spans real estate, finance, sports, media, and technology.

Nowhere is our mission more evident than Unfinished, a network of networks envisioned by Frank H. McCourt, Jr., to bring the collective creativity, knowledge, and resources of our partners together in new and innovative ways to solve the most critical challenges of our time. Unfinished leverages creative media and new technology to elevate issues and create space for inclusive conversations that lead to new solutions. By creating accessible spaces for all people to engage experts and leaders, Unfinished allows everyone to participate in the full power and possibility of civic imagination.

McCourt builds stronger communities through our real estate investments, which feature

inclusive public spaces, green technology and resilient design. Our current real estate projects include 360 Tenth Avenue in New York City; 1201 Brickell Bay Drive in Miami; the Stage in London, and 260 acres of land at Chavez Ravine in Los Angeles.

Our finance vertical provides innovators and entrepreneurs the tools they need to pursue their passions and bring ideas to life. This includes MGG Investment Group, a specialty finance firm and direct lender, and McCourt Partners, a private investment platform with more than \$1 billion in permanent capital.

Our belief in the power of sport to bring people together is an integral part of our heritage and continues with McCourt's stewardship of the iconic French football club Olympique de Marseille, which inspires the citizens of France's second city and elevates the Marseille community through the Olympic de Marseille Foundation.

McCourt also supports the McCourt School of Public Policy at Georgetown University; The Shed, a transformative cultural institution in New York City; and The McCourt Foundation, which empowers communities to build a healthier world through athletic events like the Los Angeles Marathon. These ongoing relationships are pivotal to creating and renewing institutions to confront today's most challenging problems with innovative ideas.

## Where We Are

Founded in 1893 as a Boston road-building company, McCourt has expanded to an international company with offices in New York City and Los Angeles. Our partners and businesses operate in many other places around the world, giving McCourt a truly global presence.

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WE INVEST IN BETTER

[Real Estate](#) [Overview](#) [Projects](#)

## McCourt builds stronger communities through inclusive space, green technology, and resilient design

[Read More](#)

### RECENT NEWS:

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[Read More](#)

**The Shed at Hudson Yards is launching a cool new arts program**

[Read More](#)

## Real Estate

In 2015, McCourt joined a consortium to co-develop The Stage, a mixed-use commercial and residential project in the Shoreditch neighborhood of London, UK. The site broke ground atop the site of the lost Curtain Theater of Elizabethan England, where Shakespeare first performed *Romeo and Juliet* and *Henry IV*. Upon discovering the ruins and realizing their cultural significance, the project incorporated over an acre of inclusive public space for the community, including a performance area and park, with a special exhibit showcasing the subterranean ruins of the historic landmark.

In New York City, we are developing 360 10<sup>th</sup> Avenue. Adjacent to The Shed, a transformative cultural center and founding



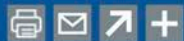
## Real Estate

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In New York City, we are developing 360 10<sup>th</sup> Avenue. Adjacent to The Shed, a transformative cultural center and founding partner of Unfinished, 360 10<sup>th</sup> Avenue will feature green technology and resilient planning to ensure minimal environmental footprint and maximum safety for tenants.

McCourt is also developing a 2-million-square-foot luxury residential property in Brickell Bay Drive in Miami, Florida. The building will be among the tallest in the state and is adaptably designed to withstand changing environmental patterns, prioritizing the long-term welfare of its residents.

McCourt currently owns 260 acres of land at Chavez Ravine in Los Angeles, the home of Dodgers Stadium. Among other plans for the area, McCourt will develop a cutting-edge aerial tramway from Los Angeles Union Station to Dodgers Stadium through its company, Aerial Rapid Transit Technologies. The aerial tram will reduce the environmental and traffic footprint caused by massive game day road congestion. Chavez Ravine is also the starting point for the Los Angeles Marathon, the world-renown endurance race donated by Frank McCourt to The McCourt Foundation in 2019.



# EXHIBIT C

Exhibit C is related to Comment GO14-10. This Exhibit material was considered in the Response to Comment GO14-10.

# McCourt builds stronger communities through inclusive space, green technology, and resilient design

[Read More](#)

RECENT NEWS:

McCourt Partners and TRU Development Announce Partnership to Develop Class A Multifamily Project in Henderson, Nevada

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McCourt Partners and HN Capital Partners Acquire Dallas Design District Portfolio

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The Stage: Curtain Raiser

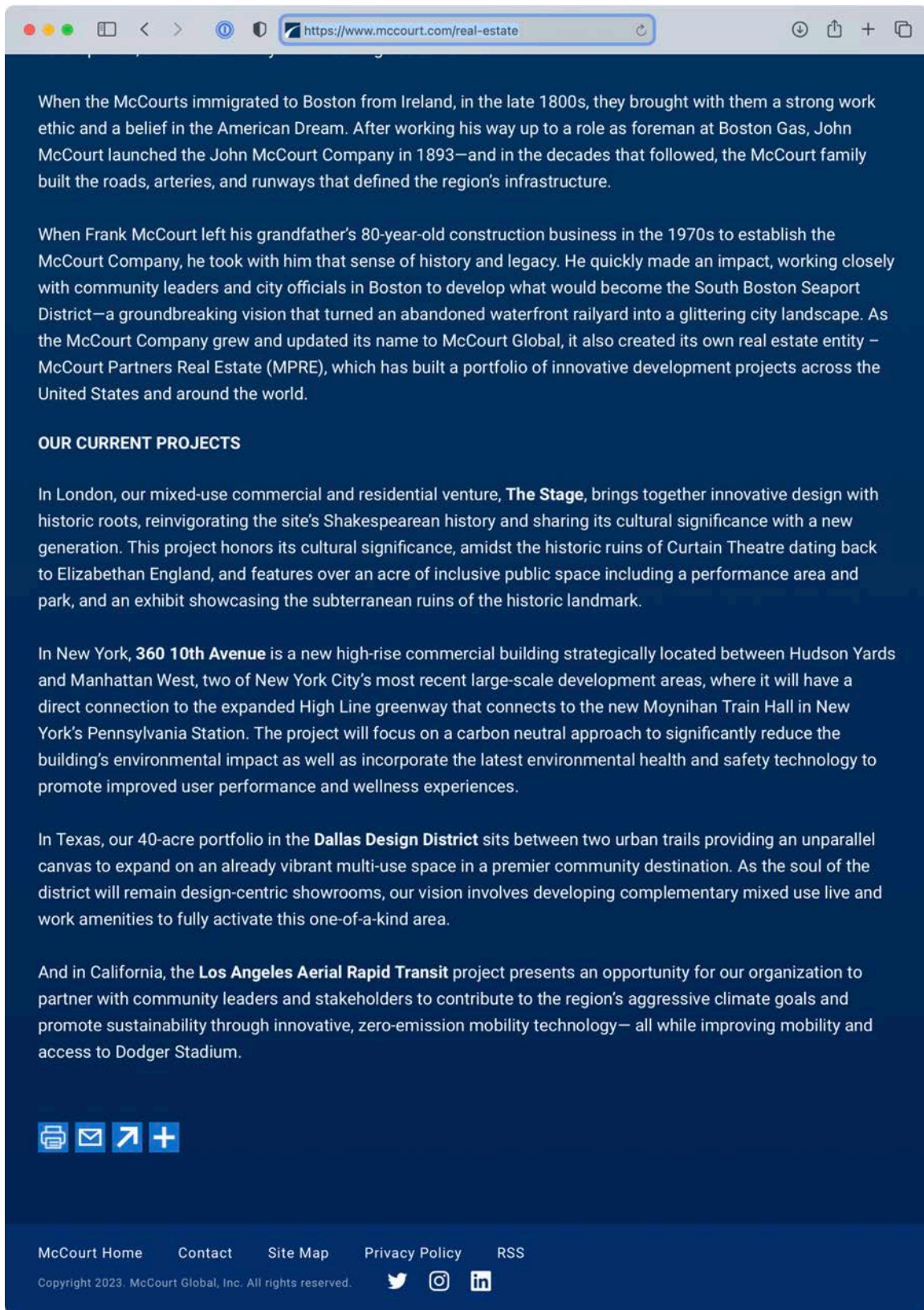
[Read More](#)

## McCourt Partners Real Estate

At McCourt, we are builders. And, our portfolio of real estate projects spans the globe, spurring growth, development, and sustainability from Los Angeles to London.

When the McCourts immigrated to Boston from Ireland, in the late 1800s, they brought with them a strong work ethic and a belief in the American Dream. After working his way up to a role as foreman at Boston Gas, John McCourt launched the John McCourt Company in 1893—and in the decades that followed, the McCourt family built the roads, arteries, and runways that defined the region's infrastructure.

When Frank McCourt left his grandfather's 80-year-old construction business in the 1970s to establish the



When the McCourts immigrated to Boston from Ireland, in the late 1800s, they brought with them a strong work ethic and a belief in the American Dream. After working his way up to a role as foreman at Boston Gas, John McCourt launched the John McCourt Company in 1893—and in the decades that followed, the McCourt family built the roads, arteries, and runways that defined the region's infrastructure.

When Frank McCourt left his grandfather's 80-year-old construction business in the 1970s to establish the McCourt Company, he took with him that sense of history and legacy. He quickly made an impact, working closely with community leaders and city officials in Boston to develop what would become the South Boston Seaport District—a groundbreaking vision that turned an abandoned waterfront railyard into a glittering city landscape. As the McCourt Company grew and updated its name to McCourt Global, it also created its own real estate entity – McCourt Partners Real Estate (MPRE), which has built a portfolio of innovative development projects across the United States and around the world.

### OUR CURRENT PROJECTS

In London, our mixed-use commercial and residential venture, **The Stage**, brings together innovative design with historic roots, reinvigorating the site's Shakespearean history and sharing its cultural significance with a new generation. This project honors its cultural significance, amidst the historic ruins of Curtain Theatre dating back to Elizabethan England, and features over an acre of inclusive public space including a performance area and park, and an exhibit showcasing the subterranean ruins of the historic landmark.

In New York, **360 10th Avenue** is a new high-rise commercial building strategically located between Hudson Yards and Manhattan West, two of New York City's most recent large-scale development areas, where it will have a direct connection to the expanded High Line greenway that connects to the new Moynihan Train Hall in New York's Pennsylvania Station. The project will focus on a carbon neutral approach to significantly reduce the building's environmental impact as well as incorporate the latest environmental health and safety technology to promote improved user performance and wellness experiences.

In Texas, our 40-acre portfolio in the **Dallas Design District** sits between two urban trails providing an unparalleled canvas to expand on an already vibrant multi-use space in a premier community destination. As the soul of the district will remain design-centric showrooms, our vision involves developing complementary mixed use live and work amenities to fully activate this one-of-a-kind area.

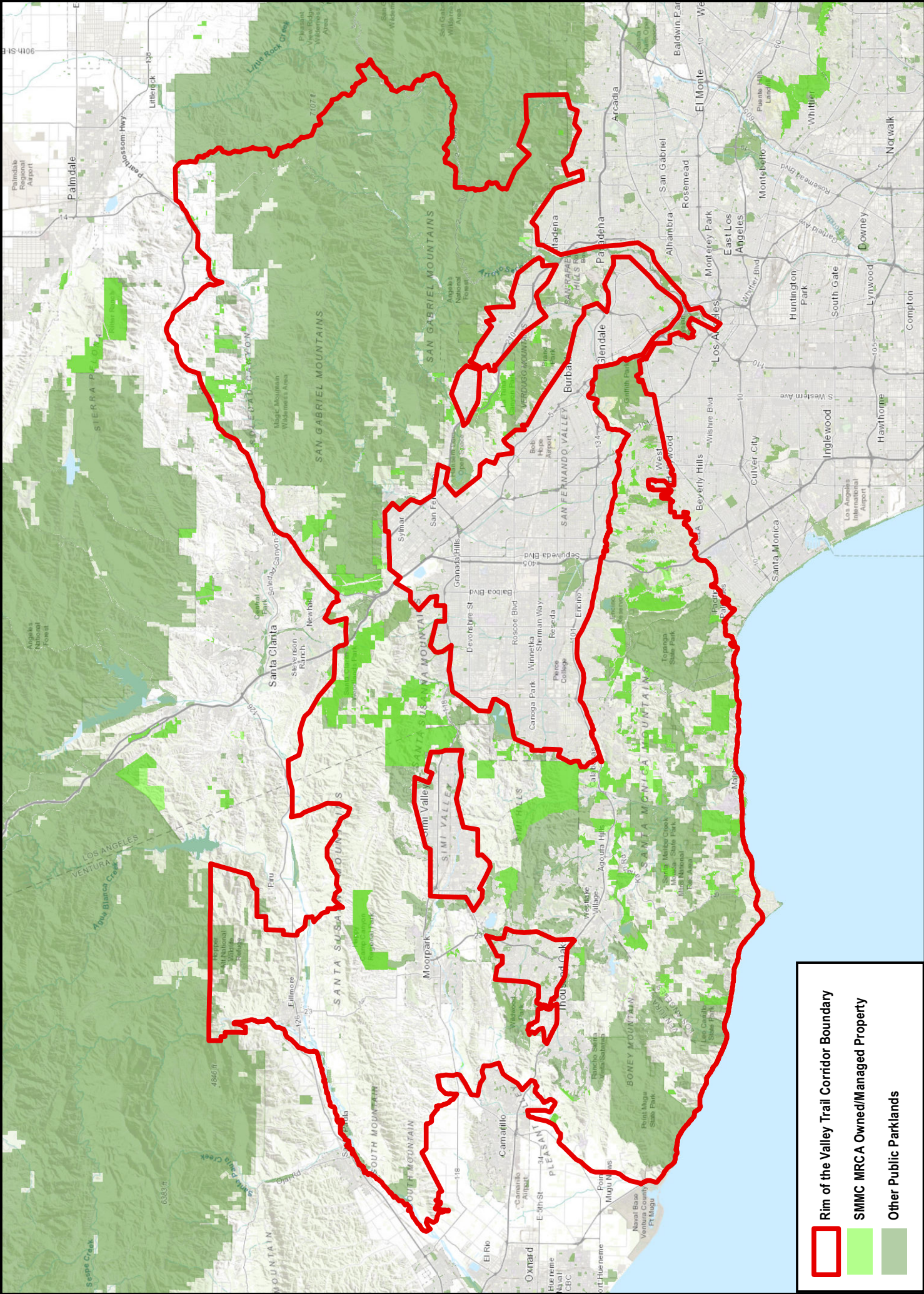
And in California, the **Los Angeles Aerial Rapid Transit** project presents an opportunity for our organization to partner with community leaders and stakeholders to contribute to the region's aggressive climate goals and promote sustainability through innovative, zero-emission mobility technology— all while improving mobility and access to Dodger Stadium.





# EXHIBIT D

Exhibit D is related to Comment GO14-15. This Exhibit material was considered in the Response to Comment GO14-15.

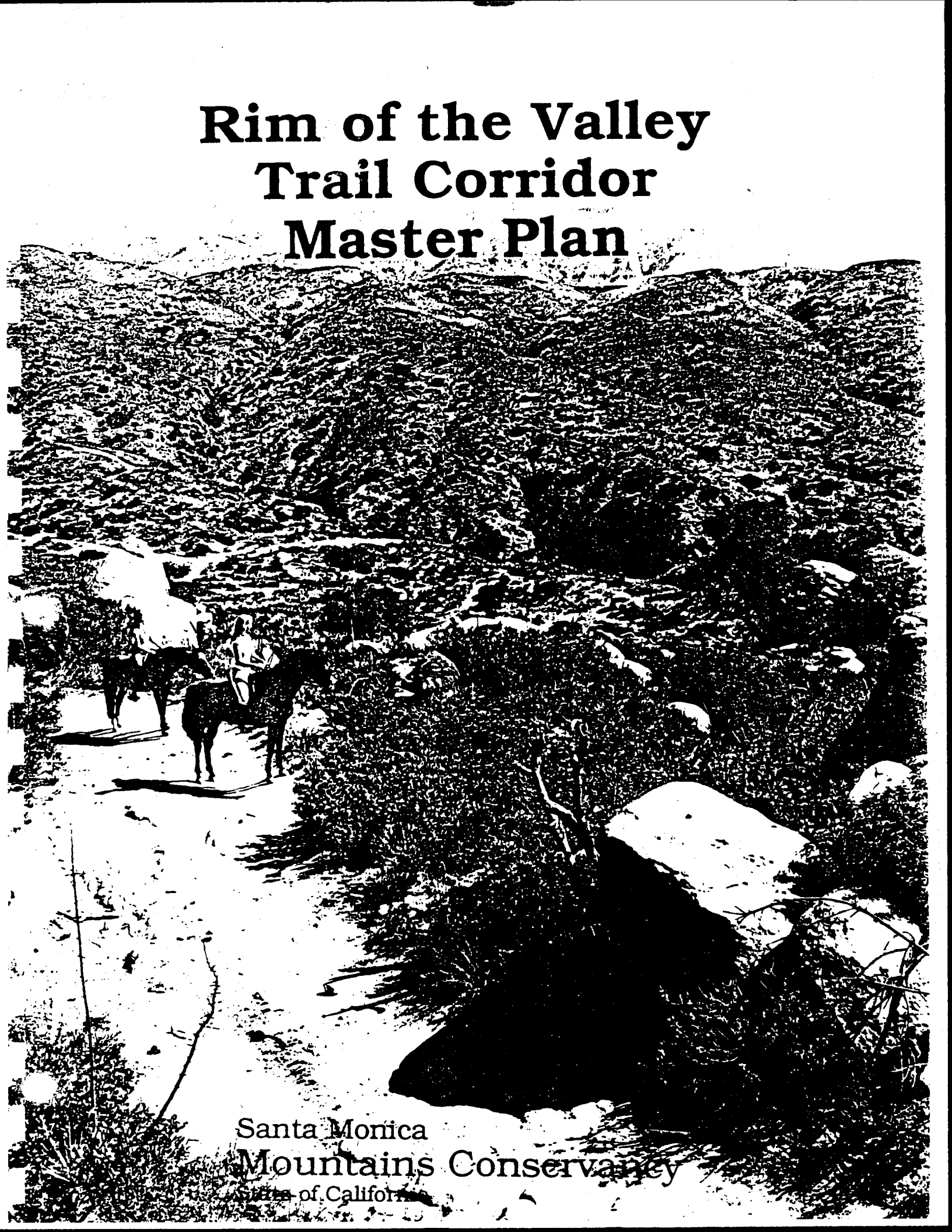


**Rim of the Valley Trail Corridor Boundary**

**SIMMC MRC-A Owned/Managed Property**

**Other Public Lands**

# Rim of the Valley Trail Corridor Master Plan



Santa Monica  
Mountains Conservancy  
State of California

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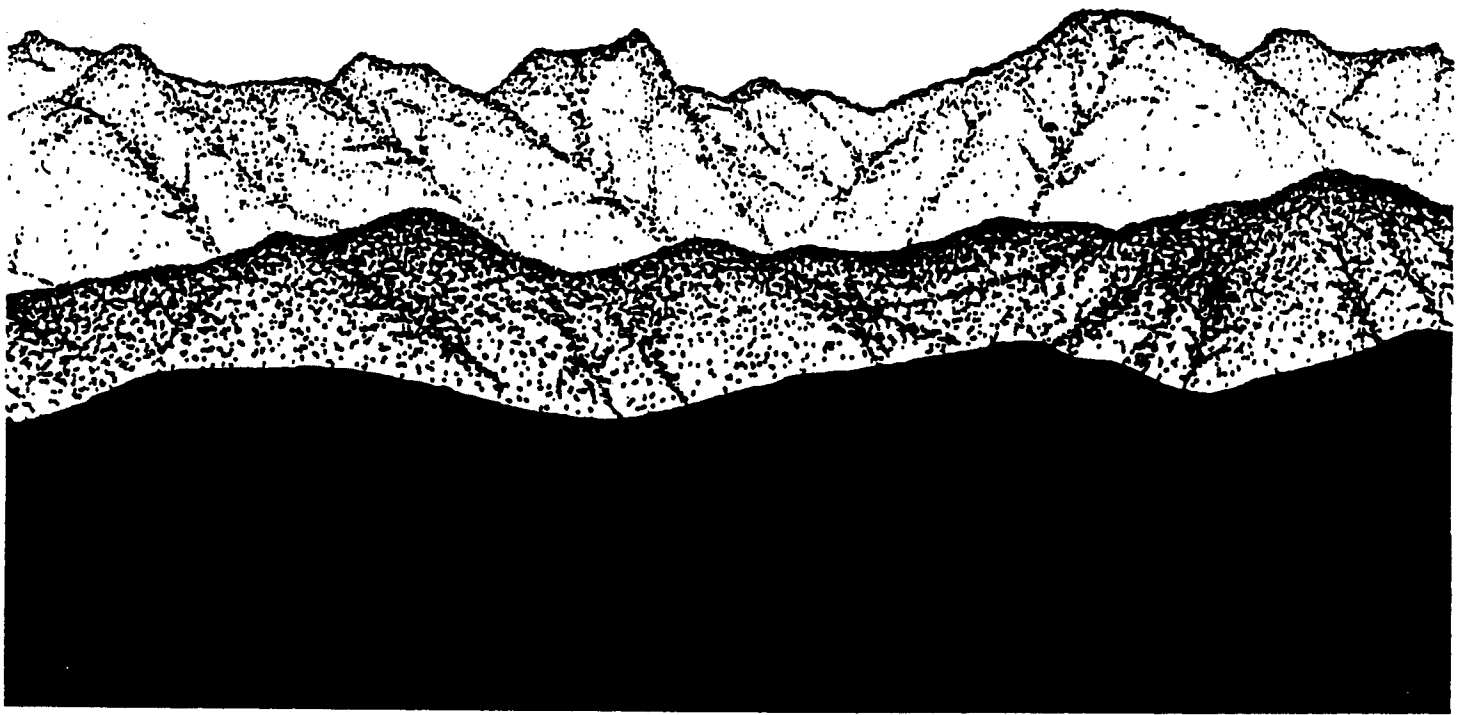
# **Rim of the Valley Trail Corridor Master Plan**

June 28, 1990

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Santa Monica  
Mountains Conservancy  
State of California

prepared by  
Dangermond & Associates



## Summary

### Rim of the Valley Trail Corridor Master Plan

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The preparation of the following Master Plan is the direct result of AB 1516 authored by Assemblyman Richard Katz which was approved by the Legislature and signed by Governor George Deukmejian in 1989. The Master Plan is intended to guide both the Mountains Conservancy and the Legislature over the next five to ten years in preserving important resources within the Rim Corridor and providing public recreation.

The legislation requires the preparation of the plan, specifies elements which must be included, requires a number of public hearings, and establishes a deadline for reporting back to the Legislature. The specific requirements have been met in accordance with the legislation.

Eleven public hearings were held by the Mountains Conservancy, as required in the legislation. These were well attended by elected officials, agency and group representatives as well as the general public. The suggestions and ideas regarding plan elements and needs of the area make up the backbone of the Master Plan which is hereby presented.

The primary components of the Master Plan are the Rim of the Valley Trail and an interlocking system of wildlife habitats and open space areas which provide a corridor connection between the Santa Monica Mountains, the Santa Susana Mountains, the Sespe Mountains and San Gabriel Mountains. Those interrelated components create a major recreation resource and a wildlife link vital to the long-term health and diversity of this region of southern California. Numerous special opportunities exist within this area and when joined together they represent an overall project of tremendous statewide significance.

The major components of the Master Plan include:

1. The Rim of the Valley Trail, which completely encircles the San Fernando and La Crescenta valleys and unifies the various parts of the corridor recreational system.
2. A wildlife corridor which connects the Santa Monica, Santa Susana, Sespe and San Gabriel Mountains. This will provide for long term biological diversity and will incorporate major habitat areas along the way, including the Santa Susana Mountains State Park, Rocky Peak and the Santa Clarita Woodlands.
3. Periodic access trails and trailheads which provide convenient points of access with companion facilities for all users.
4. Major access and loop trails which connect the Rim Trail with important natural and historic areas including: Santa Anita Canyon, Santa Clarita Woodlands,

Placerita Canyon State /County Park, Happy Camp County Park and Santa Susana Mountains State Park.

5. Additional wildlife and scenic open space areas throughout the corridor area. These lesser spaces will also be connected to the primary wildlife corridor between the mountains.
6. Recommendations for major recreational area improvements for future development at Hansen Dam, Happy Camp, Chatsworth Reservoir and Devil's Gate. These will provide large regional park facilities which are also connected to the Rim system by trails.
7. Recommendations for special use trails for nature study and for special populations such as the physically impaired.
8. Recommendations for a chain of campsites along the Rim Trail to accommodate users on extended trips.
9. Proposals for information and interpretive programs to ensure that all residents of the region have access to the parks, to inform users, and to foster good stewardship of the resource.
10. Specific recommendations for a series of boundary adjustments are proposed as a means of incorporating the important projects and additions for the Rim of the Valley Corridor system. The recommendations are: a boundary adjustment easterly to Santa Anita Canyon; westerly to the join the Conservancy Zone boundary at Calleguas Creek; and boundary adjustments to include areas north of Simi Valley and the proposed Santa Clarita Woodlands Park.

This Master Plan is a combination of all the elements found in this report, i.e.,

1. The definitions, objectives and criteria
2. The plan, as described in the text and illustrated in the figures
3. The proposed project list
4. The proposed boundary adjustments

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**Appendix B**

Suggested Projects for the Rim of the Valley Trail Corridor

Proposed Projects

Proposed Projects by Reference

Proposed Projects by Priority

**Appendix C**

Meetings with Government Agencies

**Appendix D**

Public Hearings

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Summary of Questionnaires

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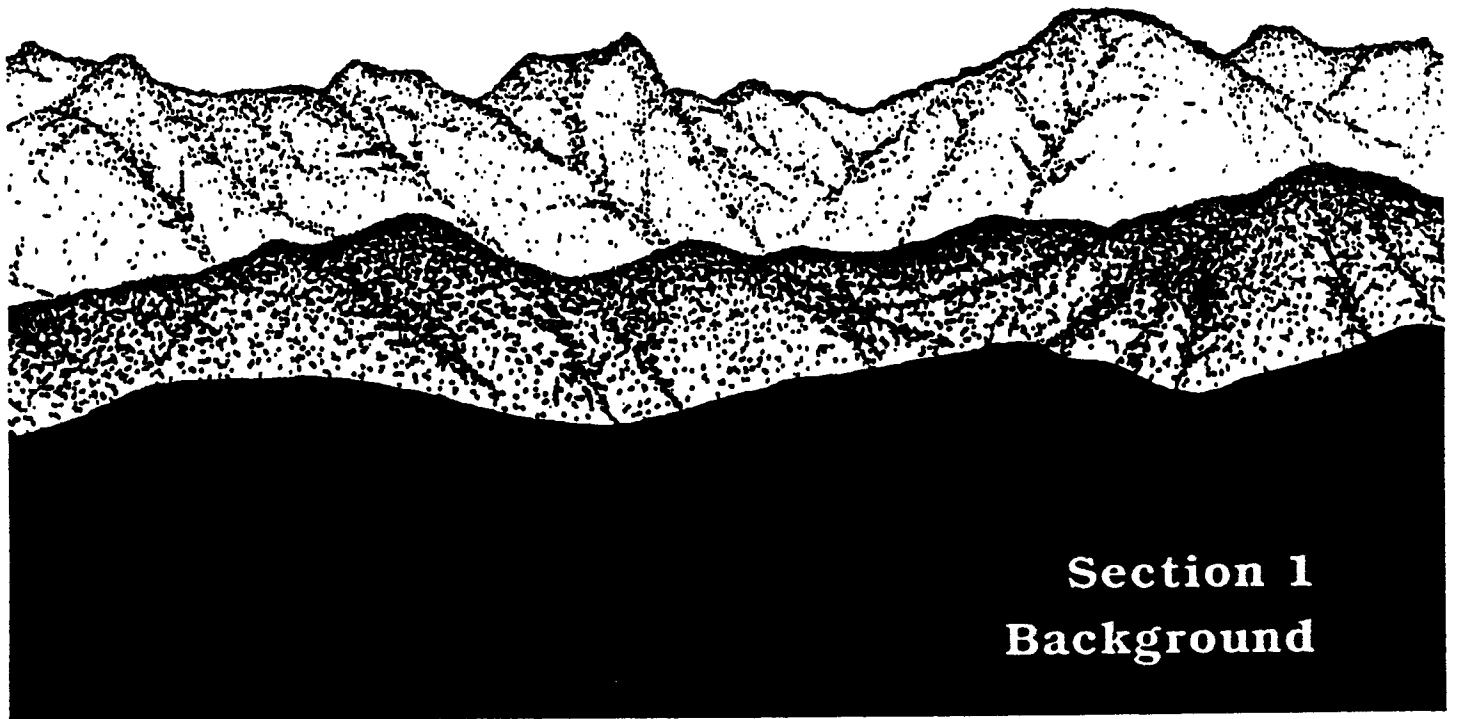
## Introduction

## INTRODUCTION

The study described in this report was authorized by Assembly Bill No 1516 of the 1989-90 session of the California Legislature, relating to the Santa Monica Mountains Conservancy Rim of the Valley Trail Corridor. The primary goal of that legislation, and therefore this study, is to establish a "master plan", or framework, for the activities and expenditures of the Santa Monica Mountains Conservancy (Conservancy) within the general Rim of the Valley Corridor area over the next ten years.

The following section of this report describes the background of the Conservancy which precedes AB 1516, while Section 2 considers in detail the language and objectives of that proposed legislation. The process and methods used in the study are presented in the third section, followed by a discussion of the Master Plan components in the Section 4. Section 5 provides an overview of the complete Master Plan. Criteria for prioritizing the projects is discussed in Section 6.

All projects considered in this study are listed in Appendix A and keyed to the 21 USGS topographical maps in Section 7 of this report. The maps indicate the location of existing and proposed parks, trails and public open space. The list includes a description of each proposed project and the source of the proposal.



**Section 1  
Background**

## SECTION 1 BACKGROUND

### THE SANTA MONICA MOUNTAINS CONSERVANCY

The Santa Monica Mountains Conservancy is a State agency created in 1980. Its goals and activities, like those of the California Department of Parks and Recreation or the National Park Service, center around both land preservation and providing opportunities for recreation. There are, however, basic and important differences. The Conservancy's range of activity is more extensive than either of those agencies or local park agencies, including greater flexibility regarding land transactions. Also, the Conservancy often uses its available funds in nontraditional ways by forming partnerships with other agencies. As such, the Conservancy is the agency with primary responsibilities for funding the acquisition of projects with statewide and regional significance, as specified in the Rim of the Valley Trail Corridor Plan of 1990 adopted pursuant to Section 33204.3 of the California Public Resources code. The Conservancy undertakes acquisitions and provides grants to local governments and non profit organizations for various combinations of planning, acquisition, improvement, operation and maintenance of wildlife habitat and recreation resources.

The Santa Monica Mountains Conservancy has filled a void between local government and state and federal agencies by working on resources of major significance in a locally relevant and sensitive manner, and by serving as a coordinator among citizen groups, agencies and landowners.

### THE RIM OF THE VALLEY TRAIL CORRIDOR

Legislation in 1983 extended the geographic limits of the Conservancy's authority to encompass an area known as the Rim of the Valley Trail Corridor (Corridor). The Rim of the Valley concept was first conceived and copyrighted by Marge Feinberg in 1974 as a Master's thesis at Cal State University, Northridge.

The Corridor, the definition of its existing boundaries, and much of the impetus for the Conservancy's involvement, came from a grass roots movement to protect the aesthetic, recreation and wildlife resources of the foothills and mountains encircling the San Fernando/La Crescenta Valleys. The Corridor is essentially a defined planning area, a broad band circling the north, east and west edges of the San Fernando/La Crescenta Valleys. It was created to facilitate the development of an interlocking, connected system of public parks, trails and wildlife habitat preserves within the mountain areas. The backbone of that system, the thread which would tie it together, was to be a multi use, long distance trail--the Rim of the Valley Trail (Rim Trail).

Within the Corridor, the Conservancy has placed particular emphasis on a cooperative approach--actions are taken basically at the request of the public or local government, acquisitions are made from willing sellers, agreements are formed with other agencies to jointly accomplish a project, and grants are made directly to local governments and non profit groups.



**Section 7**  
**Master Plan Maps**



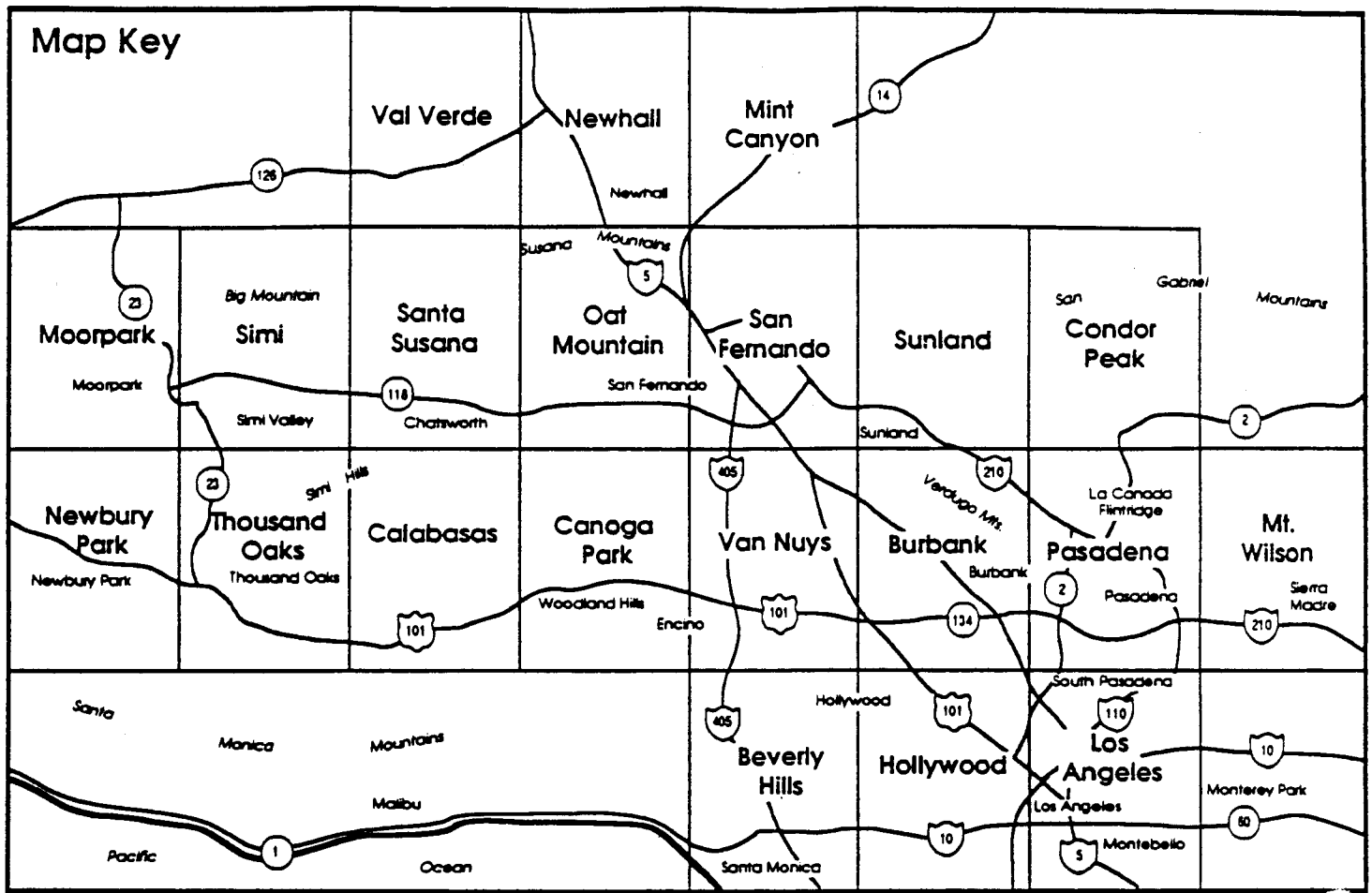
## SECTION 7 MASTER PLAN MAPS

The following maps are based on USGS topographic maps covering the Rim of the Valley Corridor and portions of the original Santa Monica Mountains zone. The maps indicate:

- The original Corridor and Santa Monica Mountains zone boundaries, and proposed adjustments
- The Rim of the Valley Trail, with identification of public, private, improved and unimproved sections
- Major loop and access trails similarly identified
- The location of proposed projects, including new acquisitions for parks or trails and improvements
- The location of existing parks and open space

The key and legend preceding the maps depict how the maps are organized and how the information is shown on each map.

Each proposed project is referenced with a unique number in only one location on the maps. Reference to the full descriptions in the list of Proposed Projects will clarify the extent of projects (particularly trail corridors) that may cover very large geographic areas. Major existing parks and open space are referenced by map name and letter.



**Legend**

**Boundaries**

- Original Rim of the Valley Corridor
- Boundary Adjustments
- Original SMMC Zone Boundary

**Rim of the Valley Trail**

- Developed and Secure for Public Use
- Developed and Not Secure for Public Use
- Not Developed & In Public Ownership
- Not Developed & In Private Ownership

**Local Trails**

- Developed and /or Proposed

**Major Loop and Access Trails**

- Developed and Secure for Public Use
- Developed and Not Secure for Public Use
- Not Developed & In Public Ownership
- Not Developed & In Private Ownership

**Public Parks and Open Space**

- Existing Public Park & Open Space
- Proposed Public Park & Open Space
- Existing Trail Head/Staging Area
- Proposed Trail Head/Staging Area
- Reference letter for Existing Parks and Open Space (Listed in Appendix A)
- Reference Number for Proposed Project (Listed in Appendix B)

(Pasadena)



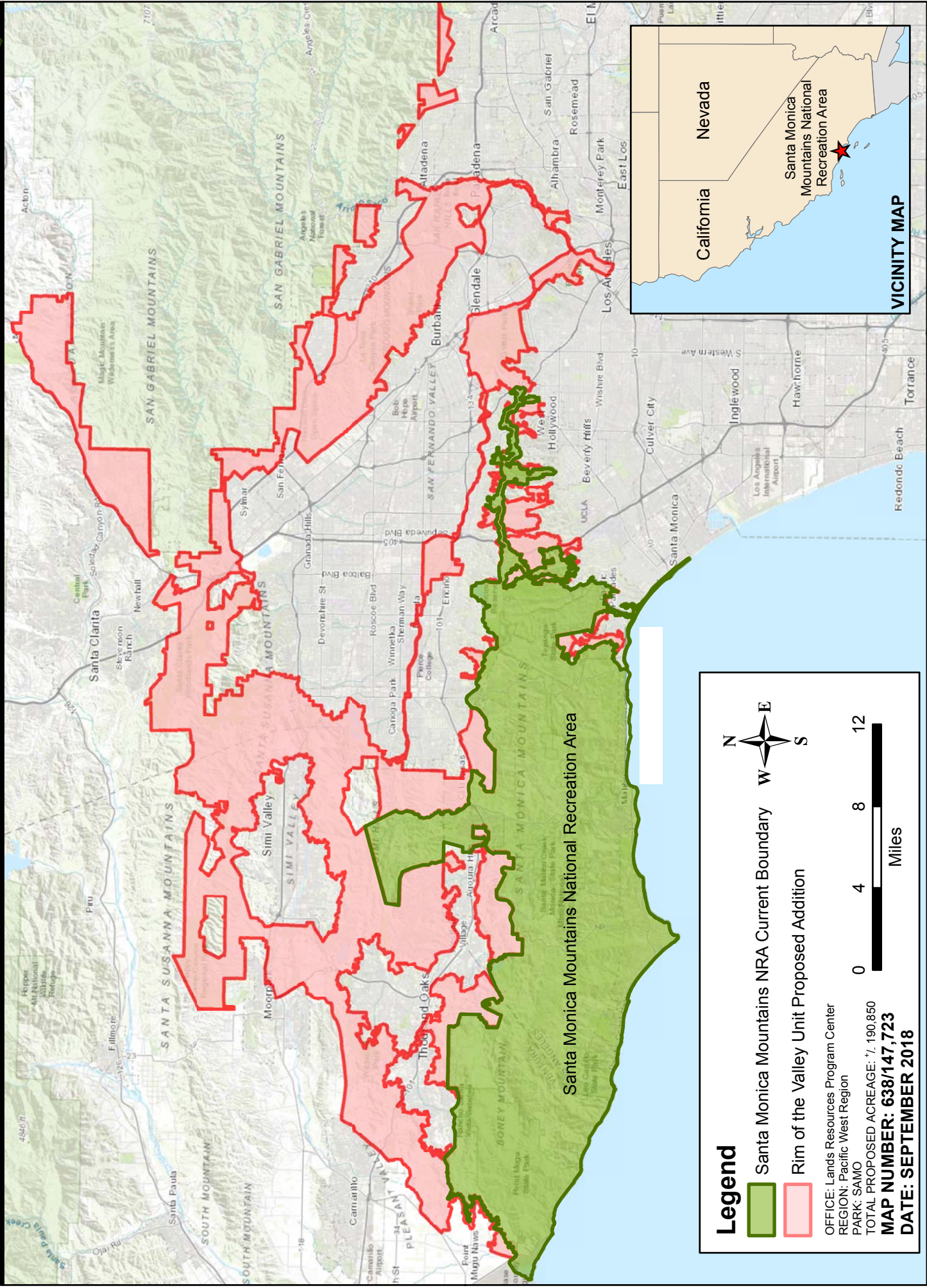
figure 24

Los Angeles


# Rim of the Valley Unit

## Santa Monica Mountains National Recreation Area

National Park Service  
U.S. Department of the Interior



### Legend

-  Santa Monica Mountains NRA Current Boundary
  -  Rim of the Valley Unit Proposed Addition
- OFFICE: Lands Resources Program Center  
REGION: Pacific West Region  
PARK: SAMO  
TOTAL PROPOSED ACREAGE: 7,190,850  
**MAP NUMBER: 638/147,723**  
**DATE: SEPTEMBER 2018**



# EXHIBIT E

Exhibit E is related to Comment GO14-15. This Exhibit material was considered in the Response to Comment GO14-15 and GO14-143.

# Summary Form for Electronic Document Submittal

Form F

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: 2020100007

Project Title: Los Angeles Aerial Rapid Transit Project

Lead Agency: Los Angeles County Metropolitan Transportation Authority (LSCMTA)

Contact Name: Cory Zelmer

Email: LAART@metro.net Phone Number: 213-922-1079

Project Location: Los Angeles Los Angeles  
*City* *County*

Project Description (Proposed actions, location, and/or consequences).

The Los Angeles Aerial Rapid Transit Project would connect Los Angeles Union Station to the Dodger Stadium property via an aerial gondola system in downtown Los Angeles. The proposed 1.2-mile route would travel generally along Alameda Street, Spring Street, and Bishops Road from LAUS to Dodger Stadium, with an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The proposed system would include aerial cables, passenger stations, a non-passenger junction, towers to support the aerial cables between the stations/junction, and gondola cabins for the passengers. When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes.

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

See attached Executive Summary

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

Other additional evaluations include an evaluation of Los Angeles State Historic Park usage, including kite flying and the Park's special events, the locations of the Alameda and Chinatown/State Park stations, and an airspace analysis as to helicopters and heliports within the Project vicinity.

Provide a list of the responsible or trustee agencies for the project.

California Department of Parks and Recreation  
California Department of Transportation  
City of Los Angeles

**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613

For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

**SCH # 2020100007****Project Title:** Los Angeles Aerial Rapid Transit Project**Lead Agency:** Los Angeles County Metropolitan Transportation Authority (Metro)**Contact Person:** Mr. Cory Zelmer**Mailing Address:** One Gateway Plaza Mail Shop 99-22-6**Phone:** 213-922-1079**City:** Los Angeles**Zip:** 90012**County:** Los Angeles**Project Location:** County: Los Angeles City/Nearest Community: Los Angeles**Cross Streets:** Alameda St from Los Angeles St to Spring St, N Broadway and Bishops Rd, Stadium Way**Zip Code:** 90012**Longitude/Latitude (degrees, minutes and seconds):** \_\_\_\_\_ ° \_\_\_\_\_ ' \_\_\_\_\_ " N / \_\_\_\_\_ ° \_\_\_\_\_ ' \_\_\_\_\_ " W **Total Acres:** \_\_\_\_\_**Assessor's Parcel No.:** Various**Section:** \_\_\_\_\_**Twp.:** \_\_\_\_\_**Range:** \_\_\_\_\_**Base:** \_\_\_\_\_**Within 2 Miles:** State Hwy #: 110**Waterways:** Los Angeles River**Airports:** \_\_\_\_\_**Railways:** \_\_\_\_\_**Schools:** Cathedral High School**Document Type:**

CEQA:  NOP  Draft EIR  Supplement/Subsequent EIR (Prior SCH No.) \_\_\_\_\_ Other: \_\_\_\_\_

NEPA:  NOI  EA  Draft EIS  FONSI

Other:  Joint Document  Final Document  Other: \_\_\_\_\_

**Local Action Type:**

General Plan Update  Specific Plan  Rezone  Annexation

General Plan Amendment  Master Plan  Prezone  Redevelopment

General Plan Element  Planned Unit Development  Use Permit  Coastal Permit

Community Plan  Site Plan  Land Division (Subdivision, etc.)  Other: Transportation

**Development Type:**

Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_

Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_

Commercial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_

Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_

Educational: \_\_\_\_\_

Recreational: \_\_\_\_\_

Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_

Transportation: Type Aerial Rapid Transit System

Mining: Mineral \_\_\_\_\_

Power: Type \_\_\_\_\_ MW \_\_\_\_\_

Waste Treatment: Type \_\_\_\_\_ MGD \_\_\_\_\_

Hazardous Waste: Type \_\_\_\_\_

Other: \_\_\_\_\_

**Project Issues Discussed in Document:**

Aesthetic/Visual  Fiscal  Recreation/Parks  Vegetation

Agricultural Land  Flood Plain/Flooding  Schools/Universities  Water Quality

Air Quality  Forest Land/Fire Hazard  Septic Systems  Water Supply/Groundwater

Archeological/Historical  Geologic/Seismic  Sewer Capacity  Wetland/Riparian

Biological Resources  Minerals  Soil Erosion/Compaction/Grading  Growth Inducement

Coastal Zone  Noise  Solid Waste  Land Use

Drainage/Absorption  Population/Housing Balance  Toxic/Hazardous  Cumulative Effects

Economic/Jobs  Public Services/Facilities  Traffic/Circulation  Other: \_\_\_\_\_

**Present Land Use/Zoning/General Plan Designation:**

Public ROW, Commercial, Public Facilities, Open Space, Industrial, Residential

**Project Description:** (please use a separate page if necessary)

The Los Angeles Aerial Rapid Transit Project would connect Los Angeles Union Station (LAUS) to the Dodger Stadium property via an aerial gondola system in downtown Los Angeles. The proposed 1.2-mile route would travel generally along Alameda Street, Spring Street, and Bishops Road from LAUS to Dodger Stadium, with an intermediate station at the southernmost entrance of the Los Angeles State Historic Park. The proposed aerial gondola system would include aerial cables, passenger stations, a non-passenger junction, towers to support the aerial cables between the stations/junction, and gondola cabins for the passengers. When complete, the proposed Project would have a maximum capacity of approximately 5,000 people per hour per direction, and the travel time from LAUS to Dodger Stadium would be approximately seven minutes.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.



## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".  
If you have already sent your document to the agency please denote that with an "S".

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Air Resources Board                         | <input checked="" type="checkbox"/> Office of Historic Preservation  |
| <input type="checkbox"/> Boating & Waterways, Department of                     | <input type="checkbox"/> Office of Public School Construction  |
| <input type="checkbox"/> California Emergency Management Agency                 | <input checked="" type="checkbox"/> Parks & Recreation, Department of                                      |
| <input checked="" type="checkbox"/> California Highway Patrol                   | <input type="checkbox"/> Pesticide Regulation, Department of   |
| <input checked="" type="checkbox"/> Caltrans District # <u>7</u>                | <input checked="" type="checkbox"/> Public Utilities Commission  |
| <input type="checkbox"/> Caltrans Division of Aeronautics                       | <input checked="" type="checkbox"/> Regional WQCB # <u>4</u>   |
| <input type="checkbox"/> Caltrans Planning                                      | <input type="checkbox"/> Resources Agency  |
| <input type="checkbox"/> Central Valley Flood Protection Board                  | <input type="checkbox"/> Resources Recycling and Recovery, Department of                                   |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy                     | <input type="checkbox"/> S.F. Bay Conservation & Development Comm.   |
| <input type="checkbox"/> Coastal Commission                                     | <input checked="" type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy                    |
| <input type="checkbox"/> Colorado River Board                                   | <input type="checkbox"/> San Joaquin River Conservancy   |
| <input checked="" type="checkbox"/> Conservation, Department of                 | <input type="checkbox"/> Santa Monica Mtns. Conservancy  |
| <input checked="" type="checkbox"/> Corrections, Department of                  | <input checked="" type="checkbox"/> State Lands Commission   |
| <input type="checkbox"/> Delta Protection Commission                            | <input type="checkbox"/> SWRCB: Clean Water Grants   |
| <input type="checkbox"/> Education, Department of                               | <input checked="" type="checkbox"/> SWRCB: Water Quality   |
| <input type="checkbox"/> Energy Commission                                      | <input type="checkbox"/> SWRCB: Water Rights   |
| <input checked="" type="checkbox"/> Fish & Game Region # <u>5</u>               | <input type="checkbox"/> Tahoe Regional Planning Agency  |
| <input type="checkbox"/> Food & Agriculture, Department of                      | <input checked="" type="checkbox"/> Toxic Substances Control, Department of                                |
| <input checked="" type="checkbox"/> Forestry and Fire Protection, Department of | <input checked="" type="checkbox"/> Water Resources, Department of   |
| <input type="checkbox"/> General Services, Department of                        |  |
| <input type="checkbox"/> Health Services, Department of                         | <input checked="" type="checkbox"/> Other: <u>California Baldwin Hills Conservancy (BHC)</u>               |
| <input type="checkbox"/> Housing & Community Development                        | <input checked="" type="checkbox"/> Other: <u>California Governor's Office of Emergency Services (OES)</u> |
| <input checked="" type="checkbox"/> Native American Heritage Commission         |  |

### Local Public Review Period (to be filled in by lead agency)

Starting Date October 17, 2022 Ending Date December 16, 2022

### Lead Agency (Complete if applicable):

Consulting Firm: <u>AECOM</u>	Applicant: <u>LA Aerial Rapid Transit Technologies LLC</u>
Address: <u>2020 L Street, 3rd Floor</u>	Address: <u>1201 N. Broadway</u>
City/State/Zip: <u>Sacramento, CA 95811</u>	City/State/Zip: <u>Los Angeles, CA 90012</u>
Contact: <u>David Rader</u>	Phone: <u>310-746-4235</u>
Phone: <u>916-414-5800</u>	

Signature of Lead Agency Representative: Cory Zelmer Printed name of the representative Date: 10/11/2022

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

# EXHIBIT F

Exhibit F is related to Comment GO14-16 and GO14-143. This Exhibit material was considered in the Response to Comment GO14-16 and GO14-143.



**ROB BONTA**  
*Attorney General*

*State of California*  
**DEPARTMENT OF JUSTICE**

300 SOUTH SPRING STREET, SUITE 1702  
LOS ANGELES, CA 90013

Public: (213) 269-6000  
Telephone: (213) 269-6383  
Facsimile: (213) 897-2801  
E-Mail: [Christina.Arndt@doj.ca.gov](mailto:Christina.Arndt@doj.ca.gov)

July 26, 2021

Joseph T. Edmiston  
Executive Director  
Santa Monica Mountains Conservancy  
26800 Mulholland Highway  
Calabasas, California 91302

Dear Mr. Edmiston,

We write concerning your recent inquiry into whether and when the Santa Monica Mountains Conservancy (the Conservancy) should be considered a trustee agency under the California Environmental Quality Act (CEQA). We conclude that the Conservancy should be considered a trustee agency for projects affecting natural resources in the Santa Monica Mountains Conservancy Zone, as defined in the Conservancy Act. (Pub. Resources Code, § 33000, et seq.)

A trustee agency is “a state agency that has jurisdiction by law over natural resources affected by a project, that are held in trust for the people of the State of California.” (Pub. Resources Code, § 21070.) Agencies reviewing projects under CEQA must notify trustee agencies and consult with them at various points in the CEQA review process. (See Pub. Resources Code, §§ 21080.3, 21153; Cal. Code Regs., tit. 14, §§ 15063, 15072, 15073, 15082, 15086.)

To be considered a trustee agency for a project, the project must affect natural resources within the agency’s jurisdiction. (Cal. Code Regs., tit. 14, § 15386.) The term “affect” has been interpreted broadly, in order to foster inter-agency consultation. (*S.F. Baykeeper, Inc. v. State Lands Com.* (2015) 242 Cal.App.4th 202, 229; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1387.)

The CEQA Guidelines give examples of four agencies that are trustee agencies:

(a) The California Department of Fish and Game with regard to the fish and wildlife of the state, to designated rare or endangered native plants, and to game refuges, ecological reserves, and other areas administered by the department.

(b) The State Lands Commission with regard to state owned “sovereign” lands such as the beds of navigable waters and state school lands.

(c) The State Department of Parks and Recreation with regard to units of the State Park System.

(d) The University of California with regard to sites within the Natural Land and Water Reserves System.

(Cal. Code Regs., tit. 14, § 15386, subd. (a)-(d).)

This list is not exclusive. Indeed, a variety of unlisted agencies have been recognized as trustee agencies. (*S.F. Baykeeper, Inc. v. State Lands Com.*, *supra*, 242 Cal.App.4th at p. 229 [the California Coastal Commission could be considered a trustee agency of a project outside the coastal zone that would have an effect on natural resources in the coastal zone]; *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1389 [the State Water Quality Control Board had the capacity to be a trustee agency on projects involving water quality]; *Schenk v. County of Sonoma* (2011) 198 Cal.App.4th 949, 958 [the Bay Area Air Quality Management District is a trustee agency].)

The Conservancy was created to address fractured land use in the Santa Monica Mountains that negatively impacts recreational and environmental value. The Legislature found that “planning for the zone was fragmented and there were ineffective means of ... evaluating individual projects within the zone as to their effect on the entire region.” (Pub. Resources Code, § 33002.) As a result, “piecemeal development projects were occurring within the zone which resulted in the irreplaceable loss of open space and recreational resources,” as well as environmental deterioration impacting fish and wildlife. (*Ibid.*) The Legislature found that the zone “exists as a single ecosystem in which changes that affect one part may also affect all other parts[,] and that the preservation and protection of this resource is in the public interest.” (Pub. Resources Code, § 33001.)

The Conservancy Act specifically identifies the Santa Monica Mountains Zone (the Zone) which includes most of the Santa Monica Mountains and a portion of the Santa Susanna Mountains. (Pub. Resources Code, §§ 33105, 33105.5, 33105.6.) The Conservancy Act states that the Zone is a “unique and valuable economic, environmental, agricultural, scientific, educational, and recreational resource that should be held in trust for present and future generations.” (Pub. Resources Code, § 33001.)

“[T]he pertinent inquiry for identifying a trustee agency is whether the project will have an effect on natural resources over which the state agency has jurisdiction.” (*S.F. Baykeeper, Inc. v. State Lands Com.*, *supra*, 242 Cal.App.4th at p. 229.) The Conservancy meets the definition of a trustee agency because it is a state agency which has jurisdiction over the natural resources of the Zone, which it holds in trust for the people of California. (Pub. Resources Code, § 33001; *Robings v. Santa Monica Mountains Conservancy* (2010) 188 Cal.App.4th 952, 957 [The Legislature “created the Santa Monica Mountains Conservancy ... as a single governmental agency with responsibility for implementing a mandate to protect and preserve the Santa Monica Mountains Zone and to promote recreational, open space, park, and conservation purposes.”].) The Conservancy has jurisdiction over natural resources throughout the Zone. (See Legis. Analyst, California’s Land Conservation Efforts: The Role of State Conservancies, Jan. 5, 2001, p. 11 [defining the jurisdiction of the Conservancy as the Santa Monica Mountains, Santa Susanna Mountains, and Placerita Canyon, aligning with the Zone].)

Therefore, we conclude that the Conservancy should be considered a trustee agency for any CEQA project which affects natural resources within the Zone. Please let us know if you have any questions.

Sincerely,



CHRISTINA BULL ARNDT  
Supervising Deputy Attorney General

# EXHIBIT G

Exhibit G is related to Comment GO14-16. This Exhibit material was considered in the Response to Comment GO14-16.

CITY OF LOS ANGELES - SURPLUS DECLARED PROPERTIES AS OF (12/6/2022)

Property	Property_Description	Address	City	Zip	Council_District	Gross_sf	Property_Type	Property_Class	Apn
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**TOTAL DECLARED  
SURPLUS  
PROPERTIES 0**

CITY OF LOS ANGELES - SURPLUS UNDECLARED PROPERTIES AS OF (12/6/2022)

Property	Property_Description	Address	City	Zip	Council_District	Gross_sf	Property_Type	Property_Class	Apn
00001605	RESIDENTIAL VACANT LAND 22345 MALDEN ST LOS ANGELES, CA 91304	22345 MALDEN ST	LOS ANGELES	91304	CD12		PARCEL	VACANT	2004018900
00001606	VACANT LAND 61005 - SLOPING LOT IN SINGLE FAMILY NEIGHBORHOOD; ACCESS TO NAPA ST 22330 NAPA ST LOS ANGELES, CA 91304	22330 NAPA ST	LOS ANGELES	91304	CD12		PARCEL	VACANT	2004018901
00001607	VACANT LAND - SLOPING LOT IN SINGLE FAMILY NEIGHBORHOOD; ACCESS TO NAPA ST22322 NAPA ST LOS ANGELES, CA 91304	22322 NAPA ST	LOS ANGELES	91304	CD12		PARCEL	VACANT	2004018902
00001635	VACANT LAND - NARROW LOT BTWN SHERMAN WAY AND WATER INFRASTRUCTURE23270 W SHERMAN WAY LOS ANGELES, CA 91307	23270 W SHERMAN WAY	LOS ANGELES	91307	CD12		PARCEL	VACANT	2028011901
00001672	VACANT LAND - HILLSIDE PARCEL IN SFH NEIGHBORHOOD; POTENTIAL ACCESS TO UNPAVED ROAD4835 N CALDERON RD LOS ANGELES, CA 91364	4835 N CALDERON RD	LOS ANGELES	91364	CD03		PARCEL	VACANT	2076003900
00001757	VACANT LAND - FUTURE PARK PROPOSED BY MRCA & RAP (CABALLERO CREEK)6353 N LINDLEY AVE	6353 N LINDLEY AVE	LOS ANGELES	91335	CD03		PARCEL	VACANT	2124018905
00001799	VACANT LAND - NARROW LOT ADJ TO SFH; BACKS TO BIKE PATH & LA RIVER19941 W HAYNES ST LOS ANGELES, CA 91367	LUBAO AVE/HAYNES ST	LOS ANGELES	91367	CD03		PARCEL	VACANT	2134041900
00002162	VACANT LAND - SITE OF DEMOLISHED SFH W/ ACCESS TO KNOBHILL DR. 3634 N KNOBHILL DR LOS ANGELES, CA 91423	3634 N KNOBHILL DR	LOS ANGELES	91423	CD04		PARCEL	VACANT	2274010900
00002163	VACANT LAND - SITE OF DEMOLISHED SFH W/ ACCESS TO KNOBHILL DR. 3650 N KNOBHILL DR LOS ANGELES, CA 91423	3650 N KNOBHILL DR	LOS ANGELES	91423	CD04		PARCEL	VACANT	2274010901
00002197	VACANT LAND - SITE IN SFH AREA BEING USED AS AN OVERLOOK; ACROSS FROM FIRE STATION NO. 10916465 W MULHOLLAND DR LOS ANGELES, CA 90049	16465 W MULHOLLAND DR	LOS ANGELES	90049	CD04		PARCEL	VACANT	2293010902
00002201	VACANT LAND - BEING USED AS ACTIVE STREET 7960 N VENTURA CANYON AVE LOS ANGELES, CA 91402	7960 N VENTURA CANYON AVE	LOS ANGELES	91402	CD06		PARCEL	STREET	2301011901
00002508	VACANT LAND - POTENTIALLY IN USE AS ROAD IN RESIDENTIAL AREAVIEWCREST RD/LAUREL TERRACE DR LOS ANGELES, CA 91604	VIEWCREST RD/LAUREL TERRACE DR	LOS ANGELES	91604	CD04		PARCEL	STREET	2376009900
00002509	VACANT LAND - VERY NARROW IMPROVED PARCEL BEING USED AS ROAD FOR SFH VIEWCREST RD/LAUREL TERRACE DR LOS ANGELES, CA 91604	VIEWCREST RD/LAUREL TERRACE DR	LOS ANGELES	91604	CD04		PARCEL	STREET	2376009901
00002511	VACANT LAND - RAW LAND/HILLSIDE USED AS WALKING PATH; ACCESS TO VENTURA BL11220 VENTURA BLVD LOS ANGELES, CA 91604	11220 VENTURA BLVD	LOS ANGELES	91604	CD04		PARCEL	VACANT	2378009900
00002512	VACANT LOT 26040 - STEEP HILLSIDE PARCEL IN SFH NEIGHBORHOOD; ACCESS TO LAURIE DR11265 LAURIE DR LOS ANGELES, CA 91604	11265 LAURIE DR	LOS ANGELES	91604	CD04		PARCEL	VACANT	2378018900
00002513	VACANT LAND - STEEP HILLSIDE PARCEL IN SFH NEIGHBORHOOD; ACCESS TO LAURIE DR11273 LAURIE DR LOS ANGELES, CA 91604	11273 LAURIE DR	LOS ANGELES	91604	CD04		PARCEL	VACANT	2378018901
00002514	VACANT LAND 26040A - STEEP HILLSIDE PARCEL IN SFH NEIGHBORHOOD; ACCESS TO LAURIE DR11247 LAURIE DR LOS ANGELES, CA 91604	11247 LAURIE DR	LOS ANGELES	91604	CD04		PARCEL	VACANT	2378018902
00002515	RESIDENTIAL VACANT LAND - STEEP HILLSIDE PARCEL IN SFH NEIGHBORHOOD; ACCESS TO EUREKA DR3897 EUREKA DR LOS ANGELES, CA 91604	3897 EUREKA DR	LOS ANGELES	91604	CD04		PARCEL	VACANT	2378018903
00002516	VACANT HILLSIDE - STEEP HILLSIDE PARCEL IN SFH NEIGHBORHOOD; ACCESS TO LAURIE DR11253 LAURIE DR LOS ANGELES, CA 91604	11253 LAURIE DR	LOS ANGELES	91604	CD04		PARCEL	VACANT	2378018904
00002517	VACANT HILLSIDE - STEEP HILLSIDE PARCEL IN SFH NEIGHBORHOOD; ACCESS TO LAURIE DR11259 LAURIE DR LOS ANGELES, CA 91604	11259 LAURIE DR	LOS ANGELES	91604	CD04		PARCEL	VACANT	2378018905
00002532	VACANT LAND - HILLSIDE; ACCESS TO LA TUNA CANYON RD SMMC LA TUNA CANYON RD LOS ANGELES, CA 91352	SMMC LA TUNA CANYON RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2401001900
00002533	VACANT LAND - HILLSIDE; ACCESS TO LA TUNA CANYON RD8874 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8874 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2401001901
00002534	VACANT LAND - HILLSIDE; NO STREET ACCESS8824 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8824 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2401002900
00002535	VACANT LAND- HILLSIDE8820 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8820 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2401002901
00002536	OPEN SPACE - HILLSIDE; ACCESS TO LA TUNA CANYON RD8742 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8742 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2401003900
00002537	VACANT LAND - HILLSIDE; NO STREET ACCESS8712 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8712 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2401003901
00002538	VACANT LAND - HILLSIDE; ACCESS TO LA TUNA CANYON RD.SMMC LA TUNA CANYON RD LOS ANGELES, CA 91352	SMMC LA TUNA CANYON RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2401003903
00002539	VACANT LAND - HILLSIDE BEHIND SFH; NO STREET ACCESS8724 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8724 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2401003904



## CITY OF LOS ANGELES - SURPLUS UNDECLARED PROPERTIES AS OF (12/6/2022)

00002540	VACANT LAND - HILLSIDE BEHIND SFH; NO STREET ACCESS8710 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8710 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401003905
00002541	VACANT LAND - HILLSIDE; ACCESS TO LA TUNA CANYON RD.8714 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8714 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401003907
00002542	VACANT LAND - HILLSIDE; ACCESS TO LA TUNA CANYON RD.8718 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8718 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401003908
00002543	VACANT LAND - HILLSIDE BEHIND SFH; NO STREET ACCESS8720 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8720 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401003909
00002545	VACANT LAND - HILLSIDE; ACCESS TO LA TUNA CANYON RD.SMMC LA TUNA CANYON RD LOS ANGELES, CA 91352	SMMC LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401004900
00002546	VACANT LAND - HILLSIDE; ACCESS TO LA TUNA CANYON RD.8754 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8754 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401004901
00002547	VACANT LAND - HILLSIDE; NO STREET ACCESS8706 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8706 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401005900
00002548	VACANT LAND - HILLSIDE; NO STREET ACCESSMMMC LA TUNA CANYON RD LOS ANGELES, CA 91352	SMMC LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401005901
00002549	VACANT LAND - HILLSIDE; NO STREET ACCESS8760 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8760 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401006900
00002553	VACANT LAND - THREE HILLSIDE PARCELS SURROUNDED BY OPEN SPACE; NO STREET ACCESS8762 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8762 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401009900
00002555	VACANT LAND - THREE HILLSIDE PARCELS SURROUNDED BY OPEN SPACE; NO STREET ACCESS8820 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8820 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401011900
00002556	VACANT LAND - THREE HILLSIDE PARCELS SURROUNDED BY OPEN SPACE; NO STREET ACCESS8814 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8814 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401011901
00002557	VACANT LAND - 3 VACANT HILLSIDE PARCELS SURROUNDED BY OPEN SPACE8830 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8830 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401011902
00002558	VACANT LAND - THREE HILLSIDE PARCELS SURROUNDED BY OPEN SPACE; NO STREET ACCESSMMMC LA TUNA CANYON RD LOS ANGELES, CA 91352	SMMC LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401012902
00002565	VACANT LAND - HILLSIDE; NO STREET ACCESS8534 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8534 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401022900
00002567	VACANT LAND - HILLSIDE; NO STREET ACCESS8542 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8542 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401022902
00002568	VACANT LAND - HILLSIDE; NO STREET ACCESS8548 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8548 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401022903
00002569	VACANT LAND - HILLSIDE W/ ACCESS TO PRIVATE UNPAVED ROAD8660 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8660 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401025900
00002570	VACANT LAND - HILLSIDE ADJ TO PRIVATE PROPERTY OWNERS8636 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8636 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401025901
00002571	VACANT LAND - HILLSIDE ADJ TO PRIVATE PROPERTY OWNERS; NO STREET ACCESS8644 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8644 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401025902
00002572	VACANT LAND - HILLSIDE ADJ TO PRIVATE PROPERTY OWNERS; NO STREET ACCESS8634 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8634 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401025903
00002573	VACANT LAND - HILLSIDE ADJ TO PRIVATE PROPERTY OWNERS; NO STREET ACCESS8632 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8632 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401025904
00002574	VACANT LAND - HILLSIDE ADJ TO PRIVATE PROPERTY OWNERS; NO STREET ACCESS8646 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8646 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401025905
00002575	VACANT LAND - HILLSIDE ADJ TO PRIVATE PROPERTY OWNERS; NO STREET ACCESS8648 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8648 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401025906
00002576	VACANT LAND - HILLSIDE ADJ TO PRIVATE PROPERTY OWNERS; NO STREET ACCESS8656 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8656 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401025907
00002577	VACANT LAND - HILLSIDE; STREET ACCESS TO LA TUNA CANYON8628 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8628 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401026900
00002578	VACANT LAND - HILLSIDE; STREET ACCESS TO LA TUNA CANYON8654 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8654 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401026901
00002579	VACANT LAND - HILLSIDE ADJ TO PRIVATE PROPERTY OWNERS; NO STREET ACCESSMMMC LA TUNA CANYON RD LOS ANGELES, CA 91352	SMMC LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401026902

00002580	VACANT LAND - HILLSIDE; STREET ACCESS TO LA TUNA CANYON8652 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8652 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401026903
00002581	VACANT LAND - HILLSIDE; NO STREET ACCESS ONLY TO UNPAVED ROAD8620 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8620 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401027900
00002582	VACANT LAND - HILLSIDE ADJ TO PRIVATE PROPERTY OWNERS; NO STREET ACCESS8622 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8622 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401027901
00002584	VACANT LAND - HILLSIDE W/ ACCESS TO PRIVATE UNPAVED ROAD8610 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8610 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2401027903
00002676	RESIDENTIAL IMPROVED - VERY STEEP HILLSIDE W/ STREET ACCESS IN RESIDENTIAL AREA7277 WOODROW WILSON DR LOS ANGELES, CA 90068	7277 WOODROW WILSON DR	LOS ANGELES	90068	CD04	PARCEL	VACANT	2427009901
00002679	VACANT LAND - VERY STEEP HILLSIDE BEHIND SFH; ACCESS TO NON-CONSTRUCTED VALLEYTON TR6939 W VALLEYTON TR LOS ANGELES, CA 90068	6939 W VALLEYTON TR	LOS ANGELES	90068	CD04	PARCEL	VACANT	2429022900
00002684	VACANT LAND - ACTIVE STREET BTWN COMMERCIAL AND BOB HOPE AIRPORT10560 W KESWICK ST LOS ANGELES, CA 91352	KESWICK ST/CLYBOURN AVE	LOS ANGELES	91352	CD02	PARCEL	ALLEY	2466029900
00002738	VACANT LAND - HILLSIDE NARROW LOT BTWN GAS STATION & 210 FWY; ACCESS TO MACLAY ST.13131 MACLAY ST LOS ANGELES, CA 91342	13131 MACLAY ST	LOS ANGELES	91342	CD07	PARCEL	VACANT	2513028908
00002779	VACANT LAND - IN USE BY ADJ PROPERTY; STREET ACCESS TO LITTLE TUJUNGA CANYON ROADLITTLE TUJUNGA RD/OSBORNE ST LOS ANGELES, CA 91342	LITTLE TUJUNGA RD/OSBORNE ST	LOS ANGELES	91342	CD07	PARCEL	VACANT	2529025900
00002856	VACANT LAND - HILLSIDE PARCEL SURROUNDED BY OPEN SPACE11460 N BIG TUJUNGA CANYON RD LOS ANGELES, CA 91040	11460 N BIG TUJUNGA CANYON RD	LOS ANGELES	91040	CD07	PARCEL	VACANT	2551012901
00002857	VACANT LAND - HILLSIDE PARCEL SURROUNDED BY VACANT HILLSIDE AND ONE PRIVATELY OWNED PROPERTY11380 N ALETHEA DR LOS ANGELES, CA 91040	11380 N ALETHEA DR	LOS ANGELES	91040	CD07	PARCEL	VACANT	2551013900
00002858	VACANT LAND - HILLSIDE PARCEL ADJ TO CITY AND PRIVATELY OWNED PROPERTY; NO STREET ACCESSALETHEA DR/RIM CANYON RD LOS ANGELES, CA 91040	ALETHEA DR/RIM CANYON RD	LOS ANGELES	91040	CD07	PARCEL	VACANT	2551013901
00002859	VACANT LAND - HILLSIDE PARCEL ADJ TO CITY AND PRIVATELY OWNED PROPERTY; NO STREET ACCESS11390 N ALETHEA DR LOS ANGELES, CA 91040	11390 N ALETHEA DR	LOS ANGELES	91040	CD07	PARCEL	VACANT	2551015900
00002860	VACANT LAND - HILLSIDE PARCEL ADJ TO CITY OWNED LAND; NO STREET ACCESSALETHEA DR/RIM CANYON RD LOS ANGELES, CA 91040	ALETHEA DR/RIM CANYON RD	LOS ANGELES	91040	CD07	PARCEL	VACANT	2551015901
00002861	VACANT LAND - HILLSIDE PARCEL ADJ TO CITY OWNED LAND; NO STREET ACCESSALETHEA DR/RIM CANYON RD LOS ANGELES, CA 91040	ALETHEA DR/RIM CANYON RD	LOS ANGELES	91040	CD07	PARCEL	VACANT	2551015902
00002875	VACANT LAND - HILLSIDE SITE OF CONTINUOUS OPEN SPACE; STREET ACCESS TO BIG TUJUNGA CANYON RD11460 N BIG TUJUNGA CANYON RD LOS ANGELES, CA 91040	BIG TUJUNGA CANYON RD/GLEASON AVE	LOS ANGELES	91040	CD07	PARCEL	VACANT	2552007907
00002885	RESIDENTIAL IMPROVED 8411 W HILLROSE ST LOS ANGELES, CA 91040	8411 W HILLROSE ST	LOS ANGELES	91040	CD07	PARCEL	VACANT	2555004900
00002913	VACANT LAND - HILLSIDE PARCEL SURROUNDED BY OPEN SPACE-NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2561012902
00002914	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2561013901
00002915	VACANT LAND - HILLSIDE; NO STREET ACCESS8823 W LA TUNA CANYON RD LOS ANGELES, CA 91352	8823 W LA TUNA CANYON RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2561013902
00002916	VACANT LAND - HILLSIDE LA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2561016901
00002917	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2561019907
00002918	VACANT LAND - HILLSIDE PARCEL SURROUNDED BY OPEN SPACELA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2561019910
00002919	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2561019913
00002920	VACANT LAND - HILLSIDE LA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2561020900
00002921	VACANT LAND - HILLSIDE LA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2561021900
00002922	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2561022900
00002923	VACANT LAND - HILLSIDE LA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07	PARCEL	VACANT	2561022901

CITY OF LOS ANGELES - SURPLUS UNDECLARED PROPERTIES AS OF (12/6/2022)

00002924	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561022902
00002925	VACANT LAND - HILLSIDE LA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561023903
00002926	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561023904
00002927	VACANT LAND - HILLSIDE LA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561023905
00002928	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561023909
00002929	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561023910
00002930	VACANT LAND-HILLSIDE PARCEL SURROUNDED BY OPEN SPACE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561023914
00002931	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561024905
00002932	VACANT LAND - HILLSIDE PARCEL SURROUNDED BY OPEN SPACE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561024906
00002933	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561024920
00002934	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561024921
00002935	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561025900
00002936	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561026900
00002937	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561028902
00002940	VACANT LAND - HILLSIDE 8713 W LA TUNA CANYON ROAD LOS ANGELES, CA 91352	8713 W LA TUNA CANYON ROAD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561028919
00002941	VACANT LAND - HILLSIDE; ADJ PROP OWNED BY LA CO FLOOD CONTROL DIST8627 W LA TUNA CANYON RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561029901
00002942	VACANT LAND - HILLSIDE 8637 W LA TUNA CANYON ROAD LOS ANGELES, CA 91352	8637 W LA TUNA CANYON ROAD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561029906
00002943	VACANT LAND - HILLSIDE; NO STREET ACCESS8621 W LA TUNA CANYON ROAD LOS ANGELES, CA 91352	8621 W LA TUNA CANYON ROAD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561029907
00002944	VACANT LAND - HILLSIDE; NO STREET ACCESSLA TUNA CANYON RD/WILDWOOD FIRE RD LOS ANGELES, CA 91352	LA TUNA CANYON RD/WILDWOOD FIRE RD	LOS ANGELES	91352	CD07		PARCEL	VACANT	2561029910
00002966	VACANT LAND - HILLSIDE PARCEL BEHIND PRIVATE RESIDENCE; ACCESS TO UNPAVED DEERWOOD TR6238 W DEERWOOD TRL LOS ANGELES, CA 91042	6238 W DEERWOOD TRL	LOS ANGELES	91042	CD07		PARCEL	VACANT	2569014900
00002968	VACANT LAND - HILLSIDE SURROUNDED BY OPEN SPACE; NO STREET ACCESS6439 W BLANCHARD CANYON RD LOS ANGELES, CA 91042	HAINES CANYON AVE/BLANCHARD CANYON RD	LOS ANGELES	91042	CD07		PARCEL	VACANT	2569022902
00003210	VACANT LAND - RECTANGULAR LOT ADJ BTWN 118 OFFRAMP AND COMMERCIAL BUSINESS15501 W CHATSWORTH ST LOS ANGELES, CA 91345	15501 W CHATSWORTH ST	LOS ANGELES	91345	CD07		PARCEL	VACANT	2649001900
00003472	VACANT LAND - FLAT SINGLE FAMILY RESIDENTIAL NEIGHBORHOOD17666 W PARTHENIA ST LOS ANGELES, CA 91325	PARTHENIA ST/WHITE OAK AVE	LOS ANGELES	91325	CD12		PARCEL	VACANT	2787031901
00003497	VACANT LAND - LOT IN SINGLE FAMILY NEIGHBORHOOD 11954 CALLE VISTA CT LOS ANGELES, CA 91326	11954 CALLE VISTA CT	LOS ANGELES	91326	CD12		PARCEL	VACANT	2872004900
00003564	RESIDENTIAL IMPROVED 8163 ZITOLA TER LOS ANGELES, CA 90293	8163 ZITOLA TERR	LOS ANGELES	90293	CD11	6,760.00	STRUCTURE	RESIDENTIAL	4115006900
00003565	RESIDENTIAL IMPROVED 01128 8156 ZITOLA TER LOS ANGELES, CA 90293	8156 ZITOLA TERR	LOS ANGELES	90293	CD11	7,110.00	STRUCTURE	RESIDENTIAL	4115007900

00003566	RESIDENTIAL IMPROVED 60083 8127 DELGANY AVE LOS ANGELES, CA 90293	8127 DELGANY AVE	LOS ANGELES	90293	CD11	5,218.00	STRUCTURE	RESIDENTIAL	4115007902
00003567	RESIDENTIAL IMPROVED 8152 ZITOLA TER LOS ANGELES, CA 90293	8152 ZITOLA TER	LOS ANGELES	90293	CD11	7,450.00	STRUCTURE	RESIDENTIAL	4115007903
00003568	RESIDENTIAL IMPROVED 8271 REES ST LOS ANGELES, CA 90293	8271 REES ST	LOS ANGELES	90293	CD11	7,450.00	STRUCTURE	RESIDENTIAL	4115009900
00004636	PARKING FACILITY - L SHAPED LOT IN USE AS ALLEY FOR ADJ.MANUFACTURERS 3251 LA CIENEGA BLVD/BALLONA CREEK LOS ANGELES, CA 90016	3251 LA CIENEGA BLVD/BALLONA CREEK	LOS ANGELES	90016	CD10		PARCEL	PARKING	4205035900
00004663	VACANT LAND - FENCED OFF LOT SURROUNDED BY RESIDENCES & BORDERING CANAL; SEWER CONSTRUCTION ON SITE 139 E HURRICANE ST LOS ANGELES, CA 90292	139 E HURRICANE ST	LOS ANGELES	90292	CD11		PARCEL	VACANT	4225008904
00004665	OPEN SPACE - PROPERTY ALONG CHANNEL 40 E JIB ST LOS ANGELES, CA 90292	40 E JIB ST	LOS ANGELES	90292	CD11		PARCEL	VACANT	4225011901
00004677	PARKING LOT 820 E WASHINGTON BLVD LOS ANGELES, CA 90292 AKA 820 W WASHINGTON BLVD LOS ANGELES, CA 90292 (ST DIRECTION IS WRONG IN LEASE)	820 E WASHINGTON BLVD	LOS ANGELES	90292	CD11		LOT	PARKING	4229017900
00004753	VACANT LAND - PART OF WESTWOOD GREENWAY PROJECT; BORDERS STOP FOR METRO EXPO LINE 10818 W EXPOSITION BLVD LOS ANGELES, CA 90064	10818 W EXPOSITION BLVD	LOS ANGELES	90064	CD05		PARCEL	VACANT	4255019900
00004754	VACANT LAND - PART OF EXPOSITION CORRIDOR BIKE PATH 2701 S SELBY AVE LOS ANGELES, CA 90064	2701 S SELBY AVE	LOS ANGELES	90064	CD05		PARCEL	VACANT	4255019901
00004755	VACANT LAND - PART OF WESTWOOD GREENWAY PROJECT; BORDERS STOP FOR METRO EXPO	2657 S OVERLAND AVE	LOS ANGELES	90064	CD05		PARCEL	VACANT	4255020900
00004756	VACANT LAND - PART OF WESTWOOD GREENWAY PROJECT; BORDERS STOP FOR METRO EXPO LINE 10815 W EXPOSITION BLVD LOS ANGELES, CA 90064	10815 W EXPOSITION BLVD	LOS ANGELES	90064	CD05		PARCEL	VACANT	4255021900
00004765	FORMER WEST LA ANIMAL SHELTER - PROPOSED AFFORDABLE HOUSING 60844 11950 MISSOURI AVE LOS ANGELES, CA 90025	11950 MISSOURI AVE	LOS ANGELES	90025	CD11	26,690.00	BUILDING	VACANT	4259020900
00004898	VACANT LAND - HILLSIDE 61002; POTENTIALLY SITE OF DEMOLISHED SFH W/ ACCESS TO BENEDICT CANYON DR 1318 BENEDICT CANYON DR LOS ANGELES, CA 90210	1318 BENEDICT CANYON DR	LOS ANGELES	90210	CD05		PARCEL	VACANT	4356011900
00004899	VACANT LAND - HILLSIDE LOT IN RESIDENTIAL AREA; ACCESS TO CIELO DR 11080 CIELO DR LOS ANGELES, CA 90210	11080 CIELO DR	LOS ANGELES	90210	CD05		PARCEL	VACANT	4357015901
00004909	VACANT LAND - HILLSIDE LOT IN RESIDENTIAL AREA; ACCESS TO CHALON RD 11381 CHALON RD LOS ANGELES, CA 90049	11381 CHALON RD	LOS ANGELES	90049	CD05		PARCEL	VACANT	4369007900
00004914	VACANT LAND - HILLSIDE LOT ADJ TO PRIV PROP OWNERS; ACCESS TO UNCONSTRUCTED FORUM LN 10535 W FORUM LN LOS ANGELES, CA 90077	10535 W FORUM LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371001900
00004915	VACANT LAND - HILLSIDE LOT BEHIND RESIDENCE; ACCESS TO UNPAVED LARNED LN LARNED LN LOS ANGELES, CA 90077	LARNED LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371006900
00004916	VACANT LAND - HILLSIDE LOT BEHIND RESIDENCE; ACCESS TO UNPAVED LISBON LN 10533 E LISBON LN LOS ANGELES, CA 90077	10533 E LISBON LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371007900
00004917	VACANT LAND - HILLSIDE LOT BEHIND RESIDENCE; ACCESS TO UNPAVED LISBON LN 10465 W LISBON LN LOS ANGELES, CA 90077	10465 W LISBON LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371008900
00004918	VACANT LAND - HILLSIDE LOT NEXT TO RESIDENTIAL AREA; ACCESS TO UNIMPROVED CRATER LN 1540 N CARTER LN LOS ANGELES, CA 90077	1540 N CARTER LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371009900
00004921	VACANT LAND - HILLSIDE LOT BEHIND RESIDENCE; ACCESS TO UNPAVED YONKERS LN 1526 N YONKERS LN YONKERS LN LOS ANGELES, CA 90077	1526 N YONKERS LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371015901
00004922	VACANT LAND - HILLSIDE PARCEL ADJ TO SFH; ACCESS TO BEVERLY GLEN DR 1207 N BEVERLY GLEN BLVD LOS ANGELES, CA 90077	1207 N BEVERLY GLEN BLVD	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371016900
00004923	VACANT LAND - HILLSIDE LOT BEHIND SFH; NO STREET ACCESS BEVERLY GLEN BLVD/HOLLYBUSH LN LOS ANGELES, CA 90077	BEVERLY GLEN BLVD/HOLLYBUSH LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371020900
00004924	VACANT LAND - SLOPING HILLSIDE; ACCESS TO UNCONSTRUCTED HOLLYBUSH LN 919 N HOLLYBUSH LN LOS ANGELES, CA 90077	919 N HOLLYBUSH LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371023900
00004925	VACANT LAND - SLOPING HILLSIDE; ACCESS TO UNCONSTRUCTED HOLLYBUSH LN 969 N HOLLYBUSH LN LOS ANGELES, CA 90077	969 N HOLLYBUSH LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371024900
00004926	VACANT LAND - HILLSIDE W/ ACCESS TO UNCONSTRUCTED HOLLYBUSH LN 1013 N HOLLYBUSH LN LOS ANGELES, CA 90077	1013 N HOLLYBUSH LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371024901
00004927	VACANT LAND - HILLSIDE W/ ACCESS TO UNCONSTRUCTED HOLLYBUSH LN 1029 N HOLLYBUSH LN LOS ANGELES, CA 90077	1029 N HOLLYBUSH LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371024902
00004928	VACANT LAND - HILLSIDE W/ ACCESS TO UNCONSTRUCTED HOLLYBUSH LN 1037 N HOLLYBUSH LN LOS ANGELES, CA 90077	1037 N HOLLYBUSH LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371024903
00004929	VACANT LAND - HILLSIDE W/ ACCESS TO UNCONSTRUCTED FERNBUSH LN HOLLYBUSH LN LOS ANGELES, CA 90077	HOLLYBUSH LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371025902

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00004930	VACANT LAND - HILLSIDE W/ ACCESS TO UNCONSTRUCTED FERNBUSH LN. & HOLLYBUSH LN1044 N FERNBUSH LN LOS ANGELES, CA 90077	1044 N FERNBUSH LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371027901
00004931	VACANT LAND - HILLSIDE IN SFH AREA W/ ACCESS TO UNCONSTRUCTED ARIMO LN1215 N ARIMO LN LOS ANGELES, CA 90077	1215 N ARIMO LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371028901
00004932	VACANT LAND - HILLSIDE ABOVE RESIDENTIAL AREA; ACCESS TO UNCONSTRUCTED ARIMO LN1401 N ARIMO LN LOS ANGELES, CA 90077	1401 N ARIMO LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371030900
00004933	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED BASIL LN 1243 N BASIL LN LOS ANGELES, CA 90077	1243 N BASIL LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371031902
00004934	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED BASIL LN 1307 N BASIL LN LOS ANGELES, CA 90077	1307 N BASIL LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371031903
00004935	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED BASIL LN 1313 N BASIL LN LOS ANGELES, CA 90077	1313 N BASIL LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371031904
00004936	VACANT LAND - SLOPING HILLSIDE; ACCESS TO UNCONSTRUCTED ARIMO LN BEVERLY GLEN BLVD/FERNBUSH LN LOS ANGELES, CA 90077	BEVERLY GLEN BLVD/FERNBUSH LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371031905
00004937	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED BASIL LN1319 N BASIL LN LOS ANGELES, CA 90077	1319 N BASIL LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371032900
00004938	VACANT LAND - SLOPING HILLSIDE; ACCESS TO UNCONSTRUCTED LANGTRY LN ARIMO LN/ BEVERLY GLEN BLVD LOS ANGELES, CA 90077	ARIMO LN/ BEVERLY GLEN BLVD	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371032903
00004939	VACANT LAND - SLOPING HILLSIDE; ACCESS TO UNCONSTRUCTED LANGTRY LN ARIMO LN/ BEVERLY GLEN BLVD LOS ANGELES, CA 90077	ARIMO LN/ BEVERLY GLEN BLVD	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371032907
00004940	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED BASIL LN. & LANGTRY LN1423 N BASIL LN LOS ANGELES, CA 90077	1423 N BASIL LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371033900
00004941	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA1517 N MIRABEL LN LOS ANGELES, CA 90077	1517 N MIRABEL LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371033902
00004942	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED LANGTRY LN1446 N LANGTRY LN LOS ANGELES, CA 90077	1446 N LANGTRY LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371033903
00004943	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNPAVED CULBERA LN1553 N CULBERA LN LOS ANGELES, CA 90077	1553 N CULBERA LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371034900
00004944	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNPAVED DESSERTY LN & CULBERA LN1600 N DESSERTY LN LOS ANGELES, CA 90077	1600 N DESSERTY LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371034903
00004945	VACANT LAND - HILLSIDE LOT; ACCESS TO UNPAVED MIRABEL LN1628 N MIRABEL LN LOS ANGELES, CA 90077	1628 N MIRABEL LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371035901
00004946	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED DESSERTY LN1611 N DESSERTY LN LOS ANGELES, CA 90077	1611 N DESSERTY LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371035902
00004947	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED DESSERTY LN1559 N DESSERTY LN LOS ANGELES, CA 90077	1559 N DESSERTY LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371035903
00004948	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED LANGTRY LN 1529 N LANGTRY LN LOS ANGELES, CA 90077	1529 N LANGTRY LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371037900
00004950	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED CRATER LN & WILD ROSE LN1707 N CRATER LN LOS ANGELES, CA 90077	1707 N CRATER LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371038901
00004951	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED CRATER LN & WILD ROSE LN1721 N CRATER LN LOS ANGELES, CA 90077	1721 N CRATER LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371038902
00004952	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED ELM TREE LN 1729 N ELM TREE LN LOS ANGELES, CA 90077	1729 N ELM TREE LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371039900
00004953	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED CALGARY LN & ELM TREE LN 1737 N ELM TREE LN LOS ANGELES, CA 90077	1737 N ELM TREE LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371039902
00004954	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA10201 W LELIA LN LOS ANGELES, CA 90077	10201 W LELIA LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371039903
00004955	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED CALGARY LN & WILD ROSE LN 1753 N WILD ROSE LN LOS ANGELES, CA 90077	1753 N WILD ROSE LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371041900
00004956	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED ELM TREE LN 1814 N ELM TREE LN LOS ANGELES, CA 90077	1814 N ELM TREE LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371041901
00004957	VACANT LAND - SLOPING HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED ELM TREE LN ELM TREE LN/ CALGARY LN LOS ANGELES, CA 90077	ELM TREE LN/ CALGARY LN	LOS ANGELES	90077	CD05	PARCEL	VACANT	4371041903

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00004958	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED CALGARY LN & ELM TREE LN 1734 N CALGARY LN LOS ANGELES, CA 90077	1734 N CALGARY LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371041905
00004959	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED CALGARY LN & ELM TREE LN 1722 N CALGARY LN LOS ANGELES, CA 90077	1722 N CALGARY LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371041906
00004961	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED CARIBOU LN 10328 W CARIBOU LN LOS ANGELES, CA 90077	10328 W CARIBOU LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4371046900
00004963	VACANT LAND - HILLSIDE L-SHAPED LOT BTWN 2 SFH; ACCESS TO ROSCOMARE RD 2081 N ROSCOMARE RD LOS ANGELES, CA 90077	2081 N ROSCOMARE RD	LOS ANGELES	90077	CD05		PARCEL	VACANT	4377013900
00004966	VACANT LAND - HILLSIDE LANDLOCKED BY ADJ PROPERTIES 2660 N ROSCOMARE RD LOS ANGELES, CA 90077	ROSCOMARE RD/HAMNER DR	LOS ANGELES	90077	CD05		PARCEL	VACANT	4378014900
00004982	VACANT LAND - HILLSIDE LOT IN RESIDENTIAL AREA NEAR STONE CANYON RESERVOIR BUSHROD LN/MANASQUAN LN LOS ANGELES, CA 90077	BUSHROD LN/MANASQUAN LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379003905
00004990	VACANT LAND - HILLSIDE LOT IN RESIDENTIAL AREA NEAR STONE CANYON RESERVOIR LATIMER LN/MANASQUAN LN LOS ANGELES, CA 90077	LATIMER LN/MANASQUAN LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379004907
00004991	VACANT LAND - SLOPING HILLSIDE LOT W/ ACCESS TO UNCONSTRUCTED MANASQUAN LN & LATIMER LN LATIMER LN/MANASQUAN LN LOS ANGELES, CA 90077	LATIMER LN/MANASQUAN LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379004910
00004992	VACANT LAND - HILLSIDE LOT BTWN 2 SFH W/ STREET ACCESS ALONG BASIL LN LATIMER LN/LOUVAN LN LOS ANGELES, CA 90077	LATIMER LN/LOUVAN LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379004912
00004994	VACANT LAND - SLOPING HILLSIDE LOT W/ ACCESS TO UNCONSTRUCTED LOUVAIN LN & LATIMER LN LATIMER LN/LOUVAN LN LOS ANGELES, CA 90077	LATIMER LN/LOUVAN LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379004914
00004995	VACANT LAND - SLOPING HILLSIDE PARCEL W/ ACCESS TO BASIL LN 2647 N BASIL LN LOS ANGELES, CA 90077	BASIL LN/LOUVAN LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379004915
00005000	VACANT LAND - SLOPING HILLSIDE LOT W/ ACCESS TO UNCONSTRUCTED LATIMER LN 2620 N LATIMER LN LOS ANGELES, CA 90077	LATIMER LN/MANASQUAN LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379006902
00005049	VACANT LAND - SLOPING HILLSIDE LOT W/ ACCESS TO UNCONSTRUCTED PERDIDO LN, POINTER LN, & RIDGETOP LN POINTER LN LOS ANGELES, CA 90077	RIDGETOP LN/POINTER LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379013903
00005055	VACANT LAND - SLOPING HILLSIDE LOT W/ ACCESS TO UNCONSTRUCTED BUSHROD LN BUSHROD LN/BONPAS LN LOS ANGELES, CA 90077	BUSHROD LN/BONPAS LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379015903
00005059	VACANT LAND - SLOPING HILLSIDE LOT W/ ACCESS TO UNCONSTRUCTED PERDIDO LN, POINTER LN, & RIDGETOP LN POINTER LN/BONPAS LN LOS ANGELES, CA 90077	POINTER LN/BONPAS LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379015907
00005087	VACANT LAND - SLOPING HILLSIDE LOT W/ ACCESS TO UNCONSTRUCTED BUSHROD LN BUSHROD LN/DEVORE LN LOS ANGELES, CA 90077	BUSHROD LN/DEVORE LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379020902
00005088	VACANT LAND - SLOPING HILLSIDE LOT W/ ACCESS TO UNCONSTRUCTED BUSHROD LN BUSHROD LN/DEVORE LN LOS ANGELES, CA 90077	BUSHROD LN/DEVORE LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4379020903
00005118	VACANT LAND - HILLSIDE LOT IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED DELLWOOD LN 2312 N DELLWOOD LN LOS ANGELES, CA 90077	2312 N DELLWOOD LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4380003900
00005120	VACANT LAND - HILLSIDE LOT IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED ELK LN 2247 N ELK LN LOS ANGELES, CA 90077	2247 N ELK LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4380006900
00005130	VACANT LAND - HILLSIDE LOT IN RESIDENTIAL AREA W/ ACCESS TO SCENARIO LN 10587 W SCENARIO LN LOS ANGELES, CA 90077	10587 W SCENARIO LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4380009900
00005145	VACANT LAND - HILLSIDE LOT IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED DELLWOOD LN 2038 N DELLWOOD LN LOS ANGELES, CA 90077	2038 N DELLWOOD LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4380016900
00005151	VACANT LAND - HILLSIDE LOT IN RESIDENTIAL AREA W/ ACCESS TO UNCONSTRUCTED DELLWOOD LN 1910 N DELLWOOD LN LOS ANGELES, CA 90077	1910 N DELLWOOD LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4380019900
00005152	VACANT LAND - HILLSIDE LOT UP & BEHIND RESIDENCE W/ ACCESS TO UNPAVED ILLIS LN 1948 N SPRUCEWOOD LN LOS ANGELES, CA 90077	1948 N SPRUCEWOOD LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4380021900
00005153	VACANT LAND - HILLSIDE LOT IN RESIDENTIAL AREA W/ ACCESS TO UNPAVED ORTIZ LN 10222 W ORTIZ LN LOS ANGELES, CA 90077	10222 W ORTIZ LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4380021902
00005154	VACANT LAND - HILLSIDE LOT USED AS PART OF DRIVEWAY FOR 2 HOMES 1917 N SPRUCEWOOD LN LOS ANGELES, CA 90077	1917 N SPRUCEWOOD LN	LOS ANGELES	90077	CD05		PARCEL	STREET	4380022900
00005155	VACANT LAND - HILLSIDE LOT IN RESIDENTIAL AREA - NO STREET ACCESS 2164 N POINTER LN LOS ANGELES, CA 90077	2164 N POINTER LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4380028900
00005157	VACANT LAND - ROCKY HILLSIDE LOT - ACCESS TO BEVERLY GLEN BL 2329 N LATIMER LN LOS ANGELES, CA 90077	2329 N LATIMER LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4380031901
00005158	VACANT LAND - ROCKY HILLSIDE LOT - NO STREET ACCESS 2353 N BASIL LN LOS ANGELES, CA 90077	2353 N BASIL LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4380032900

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00005162	VACANT LAND - HILLSIDE MARKED FOR OPEN SPACE- PART OF BEVERLY GLEN PARK BEVERLY GLEN BLVD/BASIL LN LOS ANGELES, CA 90077	BEVERLY GLEN BLVD/BASIL LN	LOS ANGELES	90077	CD05		PARCEL	VACANT	4382029900
00005170	VACANT LAND - HILLSIDE LOT ABOVE RESIDENTIAL AREA; DRIVEWAY ACCESS TO HIGH RIDGE DR 9509 HIGH RIDGE DR LOS ANGELES, CA 90210	9509 HIGH RIDGE DR	LOS ANGELES	90210	CD05		PARCEL	VACANT	4384033900
00005243	VACANT LAND - SLOPING HILLSIDE LOT IN RESIDENTIAL AREA; ACCESS TO BIENVENEDA AVES 545 N BIENVENEDA AVE LOS ANGELES, CA 90272	545 N BIENVENEDA AVE	LOS ANGELES	90272	CD11		PARCEL	VACANT	4414017901
00005252	VACANT LAND - DEMOLISHED RESIDENCE; STREET ACCESS OFF OF PASEO MIRAMAR 412 PASEO MIRAMAR LOS ANGELES, CA 90272	412 PASEO MIRAMAR	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416007905
00005253	VACANT LAND - DEMOLISHED RESIDENCE; STREET ACCESS TO UNBUILT PORTION OF CASTELLAMMARE DR CASTELLAMMARE DR/STRETTO WAY LOS ANGELES, CA 90272	CASTELLAMMARE DR/STRETTO WAY	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416010900
00005254	VACANT LAND - DEMOLISHED RESIDENCE; STREET ACCESS TO UNBUILT PORTION OF CASTELLAMMARE DR 17549-17553 CASTELLAMMARE DR LOS ANGELES, CA 90272	17549-17553 CASTELLAMMARE DR	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416010902
00005255	VACANT LAND - DEMOLISHED RESIDENCE; STREET ACCESS TO UNBUILT PORTION OF REVELLO DR 17550-17552 W REVELLO DR LOS ANGELES, CA 90272	17550-17552 W REVELLO DR	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416011900
00005256	VACANT LAND - SLOPING HILLSIDE RESIDENTIAL LOT; ACCESS TO CASTELLAMMARE DR 17637 W CASTELLAMMARE DR LOS ANGELES, CA 90272	17637 W CASTELLAMMARE DR	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416012900
00005257	VACANT LAND - RESIDENTIAL LOT; ACCESS TO CASTELLAMMARE DR 17904 (AKA 17908) W CASTELLAMMARE DR LOS ANGELES, CA 90272	17908 W CASTELLAMMARE DR	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416015900
00005258	VACANT LAND - DEMOLISHED RESIDENCE; ACCESS TO PORTO MARINA WAY 17945 PORTO MARINA WAY LOS ANGELES, CA 90272	17945 PORTO MARINA WAY	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416015901
00005260	VACANT LAND - DEMOLISHED RESIDENCE; ACCESS TO PORTO MARINA WAY 17863 PORTO MARINA WAY LOS ANGELES, CA 90272	17863 PORTO MARINA WAY	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416015903
00005261	RESIDENTIAL IMPROVED 01036 17853 PORTO MARINA WAY LOS ANGELES, CA 90272	17853 PORTO MARINA WAY	LOS ANGELES	90272	CD11	3,690.00	STRUCTURE	RESIDENTIAL	4416015904
00005262	RESIDENTIAL IMPROVED 01031 17909 PORTO MARINA WAY LOS ANGELES, CA 90272	17909 PORTO MARINA WAY	LOS ANGELES	90272	CD11	8,887.00	STRUCTURE	RESIDENTIAL	4416015905
00005263	VACANT LAND - DEMOLISHED RESIDENCE; ACCESS TO PORTO MARINA WAY 17919 PORTO MARINA WAY LOS ANGELES, CA 90272	17919 PORTO MARINA WAY	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416015906
00005264	VACANT LAND - SLOPING, DEMOLISHED RESIDENCE; ACCESS TO PORTO MARINA WAY 17924 W PORTO MARINA WAY LOS ANGELES, CA 90272	17924 W PORTO MARINA WAY	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416015907
00005265	VACANT LAND - SLOPING, DEMOLISHED RESIDENCE; ACCESS TO PORTO MARINA WAY 17916 W PORTO MARINA WAY LOS ANGELES, CA 90272	17916 W PORTO MARINA WAY	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416015908
00005266	VACANT LAND - SLOPING, DEMOLISHED RESIDENCE; ACCESS TO PORTO MARINA WAY 17910 W PORTO MARINA WAY LOS ANGELES, CA 90272	17910 W PORTO MARINA WAY	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416015909
00005267	VACANT LAND - DEMOLISHED RESIDENCE; ACCESS TO PORTO MARINA WAY 17857 PORTO MARINA WAY LOS ANGELES, CA 90272	17857 PORTO MARINA WAY	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416015910
00005269	VACANT LAND - DEMOLISHED RESIDENCE; ACCESS TO TRAMONTO DR 17600 W TRAMONTO DR LOS ANGELES, CA 90272	17600 W TRAMONTO DR	LOS ANGELES	90272	CD11		PARCEL	VACANT	4416021900
00005280	VACANT LAND - DEMOLISHED RESIDENCE; ACCESS TO MARINETTE ROAD & CHAUTAUQUA BL MARINETTE RD/ORACLE PL LOS ANGELES, CA 90272	MARINETTE RD/ORACLE PL	LOS ANGELES	90272	CD11		PARCEL	VACANT	4422003901
00005340	VACANT LAND - HILLSIDE PARCEL ABOVE RESIDENCE; NO STREET ACCESS 1461 N BUNDY DR LOS ANGELES, CA 90049	1461 N BUNDY DR	LOS ANGELES	90049	CD11		PARCEL	VACANT	4493029900
00005363	SURPLUS - EWDD JURISDICTION 5510 S MANHATTAN PL LOS ANGELES, CA 90062	5510 S MANHATTAN PL	LOS ANGELES	90062	CD08	5,958.05	STRUCTURE	RESIDENTIAL	5005031900
00005786	FORMER FIRE STATION #131206 S VERMONT AVE LOS ANGELES, CA 90006	1206 S VERMONT AVE	LOS ANGELES	90006	CD01	9,469.00	BUILDING	FIRE	5076019900
00005794	PARKING LOT-TRIANGLE SHAPED; STRIPED FOR 10 PKG SPACES IROLO/SAN MARINO LOS ANGELES, CA 90006	IROLO/SAN MARINO	LOS ANGELES	90006	CD10		LOT	PARKING	5078001916
00005976	VACANT LAND-TRIANGLE SHAPED PROPERTY (OPLA) 949 S CARONDELET ST LOS ANGELES, CA 90006	949 S CARONDELET ST	LOS ANGELES	90006	CD01		PARCEL	VACANT	5136001900
00006211	VACANT LOT WITH RAILROAD TRACKS 2551 E WASHINGTON BLVD LOS ANGELES, CA 90021	2551 E WASHINGTON BLVD	LOS ANGELES	90021	CD14		PARCEL	VACANT	5168014904
00006560	OPEN SPACE AND FLOOD CHANNEL - VACANT & FENCED OFF LAND W/ MIN. STREET ACCESS AVE 26/FIGUEROA LOS ANGELES, CA 90065	AVE 26/FIGUEROA ST	LOS ANGELES	90065	CD01		PARCEL	VACANT	5205001901
00006562	OPEN SPACE - LAND USE AND FLOOD CHANNEL LACY ST/ARTESIAN LOS ANGELES, CA 90065	LACY ST/ARTESIAN	LOS ANGELES	90065	CD01		PARCEL	VACANT	5205003900

00006563	OPEN SPACE - LAND USE AND FLOOD CHANNELLACY ST/ARTESIAN LOS ANGELES, CA 90065	LACY ST/ARTESIAN	LOS ANGELES	90065	CD01	LOT	PARKING	5205003901
00006564	OPEN SPACE AND FLOOD CHANNELPASADENA/AVE 35 LOS ANGELES, CA 90031	PASADENA/AVE 35	LOS ANGELES	90031	CD01	PARCEL	UNUSABLE	5205004900
00006595	SLIVER ON HILLSIDE - NARROW STRIP NEXT TO SINGLE FAMILY HOME W/ MIN. STREET ACCESS601 E FENN ST LOS ANGELES, CA 90031	601 E FENN ST	LOS ANGELES	90031	CD01	PARCEL	UNUSABLE	5207026900
00006598	VACANT LAND - HILLSIDE VACANT LOT IN SINGLE FAMILY RESIDENTIAL AREA-NO STREET ACCESS4338 E RADIUM DR LOS ANGELES, CA 90032	4338 E RADIUM DR	LOS ANGELES	90032	CD14	PARCEL	VACANT	5209016901
00006603	PIECE OF TOY'S AUTO DISMANTLING INC. (JUNK YARD OPLA)3031 E ALHAMBRA AVE LOS ANGELES, CA 90031	3031 E ALHAMBRA AVE	LOS ANGELES	90031	CD14	PARCEL	UNUSABLE	5210024900
00006604	VACANT LAND - FENCED OFF LOT WITH BUS STOP IN FRONT1811 N EASTLAKE AVE LOS ANGELES, CA 90031	1811 N EASTLAKE AVE	LOS ANGELES	90031	CD14	PARCEL	VACANT	5210025905
00006605	VACANT LAND - FENCED OFF NUISANCE ABATEMENT PROPERTY3124 N MAIN ST LOS ANGELES, CA 90031	3124 N MAIN ST	LOS ANGELES	90031	CD14	PARCEL	VACANT	5210025906
00006607	VACANT LAND - SLOPING HILLSIDE ZONED FOR MANUFACTURING1816 HANCOCK ST LOS ANGELES, CA 90031	1816 HANCOCK ST	LOS ANGELES	90031	CD14	PARCEL	VACANT	5210025910
00006614	VACANT LAND -DIRT ROADTOPAZ/HUNTINGTON DR S LOS ANGELES, CA 90032	TOPAZ/HUNTINGTON DR S	LOS ANGELES	90032	CD14	PARCEL	STREET	5213024900
00006615	SLIVER IN RESIDENTIAL NEIGHBORHOODKENNETH DR/HUNTINGTON DR S LOS ANGELES, CA 90032	KENNETH DR/HUNTINGTON DR S	LOS ANGELES	90032	CD14	PARCEL	UNUSABLE	5213024901
00006631	RESIDENTIAL VACANT LAND - HILLSIDE PARCEL W/ ACCESS TO DUDLEY DR. & CATO WAY4530 DUDLEY DR LOS ANGELES, CA 90032	4530 DUDLEY DR	LOS ANGELES	90032	CD14	PARCEL	VACANT	5214009900
00006671	VACANT LAND - NARROW PARCEL ADJACENT TO PRIVATE PROPERTY OWNERSPULLMAN ST/EBEY AVE LOS ANGELES, CA 90042	PULLMAN ST/EBEY AVE	LOS ANGELES	90042	CD14	PARCEL	VACANT	5301016900
00006680	VACANT LAND - HILLSIDE LOT LOCATED BEHIND SFH; NO STREET ACCESS5350 N LODGE AVE LOS ANGELES, CA 90042	5350 N LODGE AVE	LOS ANGELES	90042	CD14	PARCEL	VACANT	5302007901
00006695	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS575 E MONTECITO DR LOS ANGELES, CA 90031	575 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008900
00006696	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS531 E MONTECITO DR LOS ANGELES, CA 90031	531 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008903
00006697	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS583 E MONTECITO DR LOS ANGELES, CA 90031	583 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008904
00006698	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS483 E MONTECITO DR LOS ANGELES, CA 90031	483 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008905
00006699	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS479 E MONTECITO DR LOS ANGELES, CA 90031	479 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008906
00006700	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS519 E MONTECITO DR LOS ANGELES, CA 90031	519 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008907
00006701	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS511 E MONTECITO DR LOS ANGELES, CA 90031	511 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008908
00006702	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS527 E MONTECITO DR LOS ANGELES, CA 90031	527 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008909
00006703	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS551 E MONTECITO DR LOS ANGELES, CA 90031	551 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008910
00006704	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS571 E MONTECITO DR LOS ANGELES, CA 90031	571 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008911
00006705	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS579 E MONTECITO DR LOS ANGELES, CA 90031	579 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008912
00006706	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS587 E MONTECITO DR LOS ANGELES, CA 90031	587 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008913
00006707	VACANT SLIVER - ISLAND HILLSIDE BETWEEN MAJOR STREETSMONTECITO DR/BERENICE AVE LOS ANGELES, CA 90031	MONTECITO DR/BERENICE AVE	LOS ANGELES	90031	CD01	PARCEL	UNUSABLE	5303008914
00006708	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS507 E MONTECITO DR LOS ANGELES, CA 90031	507 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008915



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00006709	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS499 E MONTECITO DR LOS ANGELES, CA 90031	499 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008916
00006710	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS523 E MONTECITO DR LOS ANGELES, CA 90031	523 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008917
00006711	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS475 E MONTECITO DR LOS ANGELES, CA 90031	475 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008918
00006712	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS487 E MONTECITO DR LOS ANGELES, CA 90031	487 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008919
00006713	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS563 E MONTECITO DR LOS ANGELES, CA 90031	563 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008920
00006714	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS495 E MONTECITO DR LOS ANGELES, CA 90031	495 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303008921
00006715	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS443 E MONTECITO DR LOS ANGELES, CA 90031	443 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303009900
00006716	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS467 E MONTECITO DR LOS ANGELES, CA 90031	467 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303009901
00006717	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS; SEWER EASEMENT REQUESTED435 E MONTECITO DR LOS ANGELES, CA 90031	435 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303009902
00006718	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS455 E MONTECITO DR LOS ANGELES, CA 90031	455 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303009903
00006719	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS427 E MONTECITO DR LOS ANGELES, CA 90031	427 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303009904
00006722	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS607, 611, 615 E MONTECITO DR LOS ANGELES, CA 90031	607, 611, 615 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303013900
00006723	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS623 E MONTECITO DR LOS ANGELES, CA 90031	623 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303013901
00006724	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS601 E MONTECITO DR LOS ANGELES, CA 90031	601 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303013902
00006725	VACANT LAND - HILLSIDE631 E MONTECITO DR LOS ANGELES, CA 90031	631 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303013903
00006726	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS627 E MONTECITO DR LOS ANGELES, CA 90031	627 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303013904
00006727	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS619 E MONTECITO DR LOS ANGELES, CA 90031	619 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303013905
00006728	VACANT LAND - ISLAND HILLSIDE BETWEEN MAJOR STREETS643 E MONTECITO DR LOS ANGELES, CA 90031	643 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	VACANT	5303013906
00006747	VACANT SLIVER - EXTREMELY NARROW LOT; SINGLE FAMILY HOME ADJACENT820 E MONTECITO DR LOS ANGELES, CA 90031	820 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	UNUSABLE	5304002902
00006748	VACANT LAND - EXTREMELY NARROW LOT; SINGLE FAMILY HOME ADJACENT871 E MONTECITO DR LOS ANGELES, CA 90031	871 E MONTECITO DR	LOS ANGELES	90031	CD01	PARCEL	UNUSABLE	5304014900
00006786	VACANT LAND - SINGLE FAMILY LOT ADJACENT TO UNIMPROVED STREET3757 N HARRIMAN AVE LOS ANGELES, CA 90032	3757 N HARRIMAN AVE	LOS ANGELES	90032	CD14	PARCEL	VACANT	5306001900
00006868	EL CENTRO DEL PUEBLO (FORMER PARKING LOT #676 - SEE EXTRA DESC)1140 N GLENDALE BLVD LOS ANGELES, CA 90026	1140 N GLENDALE BLVD	LOS ANGELES	90026	CD13	LOT	PARKING	5404016900
00006905	VACANT LAND - NARROW STRIP NEXT TO JIA APTS.; STREET ACCESS TO SITE 425 W CESAR CHAVEZ AVE LOS ANGELES, CA 90012	425 W CESAR CHAVEZ AVE	LOS ANGELES	90012	CD01	PARCEL	VACANT	5408016900
00006948	VACANT LAND (PROPOSED AFFORDABLE HOUSING)499-503 N SAN FERNANDO RD LOS ANGELES, CA 90031	499-503 N SAN FERNANDO RD	LOS ANGELES	90031	CD01	PARCEL	VACANT	5415003906
00006950	VACANT LAND - TRIANGLE SHAPED PARCEL USED FOR STORAGE RIVERSIDE DR/FIGUEROA ST LOS ANGELES, CA 90031	RIVERSIDE DR/FIGUEROA ST	LOS ANGELES	90031	CD01	PARCEL	VACANT	5415003909
00006951	VACANT - PARCEL IS PARTIALLY COVERED BY ROAD OVERPASSAVE 19/FIGUEROA ST LOS ANGELES, CA 90031	AVENUE 19/FIGUEROA ST	LOS ANGELES	90031	CD01	PARCEL	VACANT	5415003910
00006976	VACANT LAND - HILLSIDE PARCEL ABOVE SINGLE FAMILY HOMES; NO STREET ACCESS1463 N ANGELUS AVE LOS ANGELES, CA 90026	1463 N ANGELUS AVE	LOS ANGELES	90026	CD13	PARCEL	VACANT	5424010901
00007001	SIDEWALK PARCEL ALONG RIVER - RECTANGULAR LOT BETWEEN SINGLE FAMILY HOMESSUNNYNOOK DR/LEGION LN LOS ANGELES, CA 90039	SUNNYNOOK DR/LEGION LN	LOS ANGELES	90039	CD13	PARCEL	SIDEWALK	5435034900

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00007030	VACANT LAND - RECTANGULAR LOT BTWN SINGLE FAMILY HOMES; STREET ACCESS TO LAKEVIEW AVE & SILVER LAKE CTLAKE VIEW AVE/INDIA ST LOS ANGELES, CA 90039	LAKE VIEW AVE/INDIA ST	LOS ANGELES	90039	CD13	PARCEL	VACANT	5438008900
00007077	SLIVER BEHIND RESIDENCES - PART OF ALLEY BETWEEN HOMES RIVER ST/FIGUEROA ST ALLEY LOS ANGELES, CA 90065	RIVER ST/FIGUEROA ST ALLEY	LOS ANGELES	90065	CD01	PARCEL	UNUSABLE	5446009901
00007078	SLIVER BEHIND RESIDENCES - PART OF ALLEY BETWEEN HOMES RIVER ST/FIGUEROA ST ALLEY LOS ANGELES, CA 90065	RIVER ST/FIGUEROA ST ALLEY	LOS ANGELES	90065	CD01	PARCEL	UNUSABLE	5446009902
00007079	SLIVER BEHIND RESIDENCES - PART OF ALLEY BETWEEN HOMES RIVER ST/FIGUEROA ST ALLEY LOS ANGELES, CA 90065	RIVER ST/FIGUEROA ST ALLEY	LOS ANGELES	90065	CD01	PARCEL	UNUSABLE	5446009903
00007080	SLIVER BEHIND RESIDENCES - PART OF ALLEY BETWEEN HOMES RIVER ST/FIGUEROA ST ALLEY LOS ANGELES, CA 90065	RIVER ST/FIGUEROA ST ALLEY	LOS ANGELES	90065	CD01	PARCEL	UNUSABLE	5446009904
00007083	OPEN SPACE - RAILROAD TRACKS AVE 19/FIGUEROA ST LOS ANGELES, CA 90031	AVE 19/FIGUEROA ST	LOS ANGELES	90031	CD01	INFRASTRUCTURE		5447001901
00007115	VACANT LAND - HILLSIDE BISECTED BY ROAD, AVENUE 37/ANDALUSIA AVE/CAMINO REAL LOS ANGELES, CA 90065	ANDALUSIA AVE/CAMINO REAL	LOS ANGELES	90065	CD01	PARCEL	VACANT	5451017900
00007117	VACANT LAND - STEEP HILLSIDE IN RESIDENTIAL NEIGHBORHOOD; NO STREET ACCESS 3718 E CAMINO REAL LOS ANGELES, CA 90065	3718 E CAMINO REAL	LOS ANGELES	90065	CD01	PARCEL	VACANT	5451017904
00007118	VACANT LAND - STEEP HILLSIDE IN RESIDENTIAL NEIGHBORHOOD; NO STREET ACCESS 3644 E MACEO ST LOS ANGELES, CA 90065	3644 E MACEO ST	LOS ANGELES	90065	CD01	PARCEL	VACANT	5452001900
00007127	VACANT LAND - ALLEY BTWN HOMES; NO STREET ACCESS ROSEVIEW/LOOSMORE ALLEY LOS ANGELES, CA 90065	ROSEVIEW/LOOSMORE ALLEY	LOS ANGELES	90065	CD01	PARCEL	VACANT	5453003905
00007137	VACANT LAND - HILLSIDE NO STREET ACCESS 3649 E LOOSMORE ST LOS ANGELES, CA 90065	3649 E LOOSMORE ST	LOS ANGELES	90065	CD01	PARCEL	VACANT	5454016901
00007138	VACANT LAND - HILLSIDE NEXT TO & BEHIND SFH 3642 E ROSEVIEW AVE LOS ANGELES, CA 90065	3642 E ROSEVIEW AVE	LOS ANGELES	90065	CD01	PARCEL	VACANT	5454016902
00007139	VACANT LAND - HILLSIDE IN RESIDENTIAL AREA; STREET ACCESS TO PLANNED BUT UNCONSTRUCTED ANDALUSIA AVE. 1049 W ANDALUSIA AVE LOS ANGELES, CA 90065	1049 W ANDALUSIA AVE	LOS ANGELES	90065	CD01	PARCEL	VACANT	5454018900
00007140	VACANT LAND - STEEP HILLSIDE PARCEL; ONLY ACCESS IS TO UNPAVED ANDALUSIA AVE 1085 W	1085 W ANDALUSIA AVE	LOS ANGELES	90065	CD01	PARCEL	VACANT	5454018902
00007141	VACANT LAND - EXTREMELY STEEP HILLSIDE NO STREET ACCESS CAMINO REAL LOS ANGELES, CA 90065	CAMINO REAL	LOS ANGELES	90065	CD01	PARCEL	VACANT	5454019901
00007142	VACANT LAND - HILLSIDE UP AND ABOVE SINGLE FAMILY HOME; ACCESS TO PLANNED, BUT UNPAVED MACEO ST 3633 E MACEO ST LOS ANGELES, CA 90065	3633 E MACEO ST	LOS ANGELES	90065	CD01	PARCEL	VACANT	5454020900
00007143	VACANT LAND-HILLSIDE UP AND ABOVE SINGLE FAMILY HOMES; ACCESS TO PLANNED BUT UNPAVED RIVER VIEW ST 3640 E RIVER VIEW ST LOS ANGELES, CA 90065	3640 E RIVER VIEW AVE	LOS ANGELES	90065	CD01	PARCEL	VACANT	5454020901
00007144	VACANT LAND - HILLSIDE UP AND ABOVE SINGLE FAMILY HOMES; ACCESS TO PLANNED BUT UNPAVED RIVER VIEW ST/DEL RIO AVE	ALTAMONT ST/DEL RIO AVE	LOS ANGELES	90065	CD01	PARCEL	VACANT	5454020904
00007145	VACANT LAND - HILLSIDE UP AND ABOVE SINGLE FAMILY HOMES; ACCESS TO PLANNED BUT UNPAVED ANDALUSIA AVE/LOOSMORE ST	ANDALUSIA AVE/LOOSMORE ST	LOS ANGELES	90065	CD01	PARCEL	VACANT	5454021900
00007147	VACANT LAND - SMALL LOT BETWEEN SINGLE FAMILY HOMES; STREET ACCESS TO ISABEL ST ISABEL	ISABEL ST/MACON ST	LOS ANGELES	90065	CD01	PARCEL	VACANT	5455007900
00007148	VACANT LAND - EXTREMELY NARROW STRIP ALONG CYPRESS AVE/FREDERICK ST/CYPRESS AVE LOS ANGELES, CA 90065	FREDERICK ST/CYPRESS AVE	LOS ANGELES	90065	CD01	PARCEL	UNUSABLE	5455008902
00007149	VACANT LAND - SLOPING STRIP ADJACENT TO CYPRESS AVE/SILVER ST/CYPRESS AVE LOS ANGELES, CA 90065	SILVER ST/CYPRESS AVE	LOS ANGELES	90065	CD01	PARCEL	VACANT	5455008903
00007150	VACANT LAND - EXTREMELY NARROW STRIP ALONG CYPRESS AVE/CYPRESS AVE/FUTURE ST LOS	CYPRESS AVE/FUTURE ST	LOS ANGELES	90065	CD01	PARCEL	UNUSABLE	5455009900
00007151	VACANT LAND - EXTREMELY NARROW STRIP ALONG CYPRESS AVE/CYPRESS AVE/FREDERICK ST LOS	CYPRESS AVE/FREDERICK ST	LOS ANGELES	90065	CD01	PARCEL	UNUSABLE	5455009901
00007168	VACANT LAND - POSSIBLY ACTIVE DRAIN/ RETENTION AREA 3626 N PRIMAVERA AVE LOS ANGELES,	3626 N PRIMAVERA AVE	LOS ANGELES	90065	CD01	PARCEL	VACANT	5464004900
00007187	VACANT STRIP - L SHAPED PARCEL PART OF SYCAMORE GROVE PARKAVE 49/FIGUEROA ST LOS	AVE 49/FIGUEROA ST	LOS ANGELES	90031	CD01	PARCEL	VACANT	5467011901
00007190	VACANT STRIP - SLIVER ALONG WALKING PATHAVE 49/OAK TERRACE DR LOS ANGELES, CA 90042	AVE 49/OAK TERRACE DR	LOS ANGELES	90042	CD01	PARCEL	UNUSABLE	5467012900
00007191	VACANT STRIP - WALKING TRAIL TO SYCAMORE GROVE PARKAVE 49/OAK TERRACE DR LOS ANGELES, CA 90042	AVE 49/OAK TERRACE DR	LOS ANGELES	90042	CD01	PARCEL	VACANT	5467012901
00007194	VACANT LAND - STEEP HILLSIDE AT BOTTOM OF SINGLE FAMILY HOMES 313 N FURNESS AVE LOS	313 N FURNESS AVE	LOS ANGELES	90065	CD01	PARCEL	VACANT	5467023900
00007200	VACANT SLIVER ADJACENT TO 110 FWY - LONG, NARROW LANDLOCKED PARCEL BETWEEN 110 FWY AND RESIDENCES 280 S AVE 52 LOS ANGELES, CA 90042	280 S AVE 52	LOS ANGELES	90042	CD01	PARCEL	VACANT	5468009901
00007201	VACANT STRIP - PART OF ALLEY BETWEEN HOMES AVE 54/GLEN ELLEN PL ALLEY LOS ANGELES, CA 90042	AVE 54/GLEN ELLEN PL ALLEY	LOS ANGELES	90042	CD01	PARCEL	VACANT	5468013900
00007208	VACANT LAND - SINGLE FAMILY LOT IN RESIDENTIAL NEIGHBORHOOD 5524 ECHO DR LOS ANGELES, CA 90042	5524 ECHO DR	LOS ANGELES	90042	CD01	PARCEL	VACANT	5468027900

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00007220	VACANT LAND 4276 N SCANDIA WAY LOS ANGELES, CA 90065	4276 N SCANDIA WAY	LOS ANGELES	90065	CD01	PARCEL	VACANT	5472012900
00007226	VACANT LAND - SLOPING HILLSIDE LOT IN RESIDENTIAL NEIGHBORHOOD W/ RETENTION DRAIN; STREET ACCESS TO TOWNSEND AVE 5079 N TOWNSEND AVE LOS ANGELES, CA 90042	5079 N TOWNSEND AVE	LOS ANGELES	90042	CD14	PARCEL	VACANT	5476003901
00007227	VACANT LAND - SLOPING HILLSIDE LOT IN RESIDENTIAL NEIGHBORHOOD 5081 N TOWNSEND AVE LOS ANGELES, CA 90041	5081 N TOWNSEND AVE	LOS ANGELES	90041	CD14	PARCEL	VACANT	5476003902
00007228	VACANT LAND - SLOPING HILLSIDE LOT IN RESIDENTIAL NEIGHBORHOOD TOWNSEND AVE/AVE 51 LOS ANGELES, CA 90041	TOWNSEND AVE/AVE 51	LOS ANGELES	90041	CD14	PARCEL	VACANT	5476003903
00007229	VACANT LAND - SLOPING HILLSIDE LOT IN RESIDENTIAL NEIGHBORHOOD TOWNSEND AVE/AVE 51 LOS ANGELES, CA 90041	TOWNSEND AVE/AVE 51	LOS ANGELES	90041	CD14	PARCEL	VACANT	5476003904
00007233	VACANT LAND - NARROW, SLOPING PARCEL IN SINGLE FAMILY HOME NEIGHBORHOOD; STREET ACCESS TO N AVE 56 AVE 56/WILDWOOD DR LOS ANGELES, CA 90042	AVE 56/WILDWOOD DR	LOS ANGELES	90042	CD14	PARCEL	VACANT	5480028900
00007237	VACANT LAND - TREES W/ SLOPING BACK OF LOT; STREET ACCESS TO MARIE AVE. SPRINGDALE DR/MARIE AVE LOS ANGELES, CA 90042	SPRINGDALE DR/MARIE AVE	LOS ANGELES	90042	CD14	PARCEL	VACANT	5483013900
00007274	VACANT HILLSIDE-TRIANGLE SHAPED TEMPLE ST/HOOVER ST LOS ANGELES, CA 90026	TEMPLE ST/HOOVER ST	LOS ANGELES	90026	CD13	PARCEL	VACANT	5501003900
00007276	VACANT HILLSIDE TEMPLE ST/HOOVER ST/SILVERLAKE LOS ANGELES, CA 90026	TEMPLE ST/HOOVER ST/SILVERLAKE	LOS ANGELES	90026	CD13	PARCEL	VACANT	5501004900
00007277	OPEN SPACE - STEEP HILLSIDE W/ TREES BELOW TEMPLE HOSPITAL 200 N SILVER LAKE BLVD LOS ANGELES, CA 90068	200 N SILVER LAKE BLVD	LOS ANGELES	90004	CD13	PARCEL	VACANT	5501004902
00007322	OPEN SPACE - PARK/GARDEN 6614 W FOUNTAIN AVE LOS ANGELES, CA 90038	6614 W FOUNTAIN AVE	LOS ANGELES	90038	CD13	PARCEL	RECREATION	5532001900
00007323	MANSFIELD FOUNTAIN COMMUNITY GARDEN 6910 W FOUNTAIN AVE LOS ANGELES, CA 90038	6910 W FOUNTAIN AVE	LOS ANGELES	90038	CD13	PARCEL	VACANT	5532008904
00007429	VACANT LAND - W/ 2 BILLBOARDS 1901-1905 N HIGHLAND AVE LOS ANGELES, CA 90068	1905 N HIGHLAND AVE	LOS ANGELES	90068	CD04	PARCEL	VACANT	5549018900
00007430	VACANT LAND - SEE EXTRA DESCRIPTION 1911 N HILLCREST RD LOS ANGELES, CA 90028	1911 N HILLCREST RD	LOS ANGELES	90028	CD04	PARCEL	VACANT	5549019900
00007432	UNDER REVIEW - VACANT - FLAG LOT WITH ACCESS ROAD PARCEL 6945 CAMROSE DR LOS ANGELES, CA 90068	6945 CAMROSE DR	LOS ANGELES	90068	CD04	PARCEL	VACANT	5549024900
00007432	UNDER REVIEW - VACANT - FLAG LOT WITH ACCESS ROAD PARCEL 6945 CAMROSE DR LOS ANGELES, CA 90068	6945 CAMROSE DR	LOS ANGELES	90068	CD04	PARCEL	VACANT	5549024901
00007438	VACANT LAND - STEEP HILLSIDE ADJACENT TO SINGLE FAMILY HOMES (CONTIGUOUS PROPERTIES TOTAL 27,278 SQFT, SEE OTHER SURPLUS PROP ON SEAVIEW) 1770 N SEAVIEW TR LOS ANGELES, CA	1770 N SEAVIEW TR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5551032901
00007439	VACANT LAND-STEEP HILLSIDE ADJACENT TO SINGLE FAMILY HOMES (CONTIGUOUS PROPERTIES TOTAL 27,278 SQFT, SEE OTHER SURPLUS PROP ON SEAVIEW) 1762 N SEAVIEW TR LOS ANGELES, CA	1762 N SEAVIEW TR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5551032902
00007440	VACANT LAND-STEEP HILLSIDE ADJACENT TO SINGLE FAMILY HOMES (CONTIGUOUS PROPERTIES TOTAL 27,278 SQFT, SEE OTHER SURPLUS PROP ON SEAVIEW) 1754 N SEAVIEW TR LOS ANGELES, CA	1748 N SEAVIEW TR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5551032903
00007441	VACANT LAND-STEEP HILLSIDE ADJACENT TO SINGLE FAMILY HOMES (CONTIGUOUS PROPERTIES TOTAL 27,278 SQFT, SEE OTHER SURPLUS PROP ON SEAVIEW) 1754 N SEAVIEW TR LOS ANGELES, CA	1754 N SEAVIEW TR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5551032904
00007442	VACANT LAND-STEEP HILLSIDE ADJACENT TO SINGLE FAMILY HOMES (CONTIGUOUS PROPERTIES TOTAL 27,278 SQFT, SEE OTHER SURPLUS PROP ON SEAVIEW) 1752 N SEAVIEW TR LOS ANGELES, CA	1752 N SEAVIEW TR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5551032905
00007447	VACANT HILLSIDE-TRIANGLE SHAPED ADJACENT TO PRIVATE HOMEOWNER 1635 LAUREL CANYON BLVD LOS ANGELES, CA 90046	1635 LAUREL CANYON BLVD	LOS ANGELES	90046	CD04	PARCEL	VACANT	5555032900
00007448	VACANT LAND-STEEP HILLSIDE ADJACENT SINGLE FAMILY RESIDENTIAL NEIGHBORHOOD 1951 N LAUREL CANYON BLVD LOS ANGELES, CA 90046	1951 N LAUREL CANYON BLVD	LOS ANGELES	90046	CD04	PARCEL	VACANT	5556001900
00007449	VACANT HILLSIDE, VERY NARROW PROPERTY BEHIND SINGLE FAMILY RESIDENTIAL HOMES GOULD AVE/PADRE LN LOS ANGELES, CA 90046	GOULD AVE/PADRE LN	LOS ANGELES	90046	CD04	PARCEL	VACANT	5556001901
00007450	VACANT LAND-VERY STEEP HILLSIDE ADJACENT TO SINGLE FAMILY HOMES 8242 W GOULD AVE LOS ANGELES, CA 90046	8242 W GOULD AVE	LOS ANGELES	90046	CD04	PARCEL	VACANT	5556003900
00007451	VACANT LAND-VERY STEEP HILLSIDE ADJACENT TO SINGLE FAMILY HOMES 8284 W GOULD AVE LOS ANGELES, CA 90046	8284 W GOULD AVE	LOS ANGELES	90046	CD04	PARCEL	VACANT	5556003901
00007453	VACANT LAND-VERY STEEP HILLSIDE ADJACENT TO SINGLE FAMILY HOMES 8296 E BAIRD RD LOS ANGELES, CA 90069	8296 E BAIRD RD	LOS ANGELES	90069	CD04	PARCEL	VACANT	5556008900
00007454	VACANT LAND-EXTREMELY NARROW HILLSIDE BEHIND SINGLE FAMILY HOMES KINGS WAY/HILLSIDE AVE LOS ANGELES, CA 90069	KINGS WAY/HILLSIDE AVE	LOS ANGELES	90069	CD04	PARCEL	UNUSABLE	5556016900
00007455	RESIDENTIAL IMPROVED 8455 W GRAND VIEW DR LOS ANGELES, CA 90046	8455 W GRAND VIEW DR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5556017900
00007457	VACANT LAND-HILLSIDE ADJACENT TO SIMILAR SIZED SINGLE FAMILY LOTS 8327 W GRAND VIEW DR	8327 W GRAND VIEW DR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5556019900

CITY OF LOS ANGELES - SURPLUS UNDECLARED PROPERTIES AS OF (12/6/2022)

00007458	VACANT LAND-VERY STEEP HILLSIDE BEHIND/NEXT TO SINGLE FAMILY HOMES8430 W YUCCA TR LOS ANGELES, CA 90046	8430 W YUCCA TR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5556020900
00007460	VACANT LAND-NARROW HILLSIDE PARCEL BEHIND SINGLE FAMILY HOMESMARMONT AVE/LOT CC	MARMONT AVE/LOT CC	LOS ANGELES	90069	CD04	PARCEL	VACANT	5556022902
00007461	VACANT LAND-HILLSIDE CANYON BEHIND SINGLE FAMILY HOMESNORTH OF 1698 MARMONT AVE LOS ANGELES, CA 90069	NORTH OF 1698 MARMONT AVE	LOS ANGELES	90069	CD04	PARCEL	VACANT	5556023901
00007462	VACANT LAND-NARROW HILLSIDE/CANYON BEHIND SINGLE FAMILY HOMES (BEING USED AS DRAIN)NORTH OF 1698 MARMONT AVE LOS ANGELES, CA 90069	NORTH OF 1698 MARMONT AVE	LOS ANGELES	90069	CD04	PARCEL	VACANT	5556023902
00007465	VACANT LAND-NARROW LOT BETWEEN SINGLE FAMILY HOMES (OPLA)LOOKOUT MOUNTAIN	LOOKOUT MOUNTAIN AVE/WONDERLAND AVE	LOS ANGELES	90046	CD04	PARCEL	VACANT	5562001902
00007470	VACANT LAND - STEEP HILLSIDE ADJACENT TO ONE PRIVATE LANDOWNER8889 W CRESCENT DR LOS ANGELES, CA 90046	8889 W CRESCENT DR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5563005901
00007472	RESIDENTIAL IMPROVED - DRIVEWAYCRESCENT DR LOS ANGELES, CA 90046	CRESCENT DR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5563011900
00007487	VACANT LAND-POTENTIALLY UNBUILDABLE HILLSIDE 8320 W LOOKOUT MOUNTAIN AVE LOS ANGELES, CA 90046	8320 W LOOKOUT MOUNTAIN AVE	LOS ANGELES	90046	CD04	PARCEL	VACANT	5567004902
00007488	VACANT LAND - POTENTIALLY NON BUILDABLE HILLSIDE; ACCESS TO LOOKOUT MOUNTAIN AVE8310 W LOOKOUT MOUNTAIN AVE LOS ANGELES, CA 90046	8310 W LOOKOUT MOUNTAIN AVE	LOS ANGELES	90046	CD04	PARCEL	VACANT	5567004903
00007489	VACANT LAND-POTENTIALLY UNBUILDABLE HILLSIDE 8300 W LOOKOUT MOUNTAIN AVE LOS ANGELES, CA 90046	8300 W LOOKOUT MOUNTAIN AVE	LOS ANGELES	90046	CD04	PARCEL	VACANT	5567004904
00007490	VACANT LAND-POTENTIALLY UNBUILDABLE HILLSIDE 8244 W LOOKOUT MOUNTAIN AVE LOS	8244 W LOOKOUT MOUNTAIN AVE	LOS ANGELES	90046	CD04	PARCEL	VACANT	5567004905
00007492	VACANT LAND-VERY STEEP HILLSIDE IN SINGLE FAMILY RESIDENTIAL AREA8317 W WYNDHAM RD LOS ANGELES, CA 90046	8317 W WYNDHAM RD	LOS ANGELES	90046	CD04	PARCEL	VACANT	5567007900
00007493	VACANT LAND-VERY STEEP HILLSIDE IN SINGLE FAMILY RESIDENTIAL AREA8301 W WYNDHAM RD LOS ANGELES, CA 90046	8301 W WYNDHAM RD	LOS ANGELES	90046	CD04	PARCEL	VACANT	5567007901
00007494	VACANT LAND-HILLSIDE W/ ROAD ACCESS IN SINGLE FAMILY RESIDENTIAL AREA2172 N BEECH KNOLL RD LOS ANGELES, CA 90046	2172 N BEECH KNOLL RD	LOS ANGELES	90046	CD04	PARCEL	VACANT	5567008900
00007499	VACANT LAND-VERY STEEP HILLSIDE BEHIND SINGLE FAMILY HOMESNASH DR/JEWETT DR LOS ANGELES, CA 90046	NASH DR/JEWETT DR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5567015900
00007500	VACANT LAND-SEE EXTRA DESCRIPTION8513 NASH DR LOS ANGELES, CA 90046	8513 NASH DR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5567015901
00007502	VACANT LAND-VERY STEEP HILLSIDE BEHIND SINGLE FAMILY HOMES. NO STREET ACCESS2008 N BEECH KNOLL RD LOS ANGELES, CA 90046	2008 N BEECH KNOLL RD	LOS ANGELES	90046	CD04	PARCEL	VACANT	5567021901
00007507	VACANT LAND-STEEP HILLSIDE BEHIND SINGLE FAMILY HOMES;MINIMAL STREET ACCESSMULHOLLAND DR/PALO VISTA DR LOS ANGELES, CA 90046	MULHOLLAND DR/PALO VISTA DR	LOS ANGELES	90046	CD04	PARCEL	VACANT	5570007900
00007551	VACANT LAND-PROPERTY W/ STREET ACCESS IN SINGLE FAMILY RESIDENTIAL AREA3008 N LAKERIDGE DR LOS ANGELES, CA 90068	3008 N LAKERIDGE DR	LOS ANGELES	90068	CD04	PARCEL	VACANT	5577020900
00007573	VACANT LAND-HILLSIDE W/ ROAD ACCESS IN SINGLE FAMILY RESIDENTIAL ARE3090 N HOLLYRIDGE DR LOS ANGELES, CA 90068	3090 N HOLLYRIDGE DR	LOS ANGELES	90068	CD04	PARCEL	VACANT	5583021900
00007575	VACANT LAND-VERY STEEP HILLSIDE BEHIND SINGLE FAMILY HOMES2766 N PITCHER DR LOS ANGELES, CA 90068	2766 N PITCHER DR	LOS ANGELES	90068	CD04	PARCEL	VACANT	5585003900
00007658	VACANT LAND - HILLSIDE PARCEL W/ STREET FRONTAGE IN RESIDENTIAL AREATOWNSEND AVE/SILVER OAK TER LOS ANGELES, CA 90041	TOWNSEND AVE/SILVER OAK TER	LOS ANGELES	90041	CD14	PARCEL	VACANT	5689031905
00007660	VACANT LAND - HILLSIDE LOT BTWN EAGLE ROCK HS & TOWNSEND AVESILVER OAK TERR/TOWNSEND AVE LOS ANGELES, CA 90041	SILVER OAK TERR/TOWNSEND AVE	LOS ANGELES	90041	CD14	PARCEL	VACANT	5689031907
00007861	VACANT LAND - POTENTIALLY PART OF WATTS TOWERS ART CENTER10620 S GRAHAM AVE LOS ANGELES, CA 90002	10620 S GRAHAM AVE	LOS ANGELES	90002	CD15	PARCEL	VACANT	6065034908
00007868	HEART OF WATTS COMMUNITY GARDEN 2254 E 103RD ST LOS ANGELES, CA 90002	2254 E 103RD ST	LOS ANGELES	90002	CD15	PARCEL	RECREATION	6066015900
00007922	VACANT LAND - PARCEL BTWN HOMES & TRAIN TRACKS; NO STREET ACCESS1568 E 110TH ST LOS	1568 E 110TH ST	LOS ANGELES	90059	CD15	PARCEL	VACANT	6070008901
00007943	SIDEWALK PARCEL - APPEARS OCCUPIED BY MAXINE WATERS EMPLOYMENT PREPARATION CENTER; REMAINDER OWNED BY LAUSD1102 E 108TH ST LOS ANGELES, CA 90059	1102 E 108TH ST	LOS ANGELES	90059	CD15	PARCEL	SIDEWALK	6071018900
00008697	VACANT LAND - SEE EXTRA DESCRIPTION - PROPOSED FOR COMMUNITY GARDEN600 E L ST LOS ANGELES, CA 90744	600 E L ST	LOS ANGELES	90744	CD15	PARCEL	VACANT	7423026900

00008729	VACANT LAND E ST/ALAMEDA ST LOS ANGELES, CA 90744	E ST/ALAMEDA ST	LOS ANGELES	90744	CD15	PARCEL	VACANT	7424017912
00008760	VACANT LAND - STREET ACCESS TO SANDISON ST1305 E SANDISON ST LOS ANGELES, CA 90744	1305 E SANDISON ST	LOS ANGELES	90744	CD15	PARCEL	VACANT	7426008900
00009473	FORMER FIRE STATION #53 19016 438 N MESA ST LOS ANGELES, CA 90731	438 N MESA ST	LOS ANGELES	90731	CD15	BUILDING	FIRE	7449000900
00012911	VACANT LAND - RECTANGULAR LOT ADJ TO RESIDENTIAL LOW-DENSITY USES; STREET ACCESS 16215	16215 BONSALLO	LOS ANGELES	90247	CD15	PARCEL	VACANT	6120021900
00012970	SURPLUS - EWDD JURISDICTION12243 BLAKLEY AVE LOS ANGELES, CA 90059	12243 BLAKLEY AVE	LOS ANGELES	90059	CD99	PARCEL	RESIDENTIAL	6148021270
00013147	VACANT LAND - HILLSIDE PARCEL ABOVE SINGLE FAMILY HOMES-NO STREET ACCESS1467 N	1467 N ANGELUS AVE	LOS ANGELES	90026	CD13	PARCEL	VACANT	5424010900

**TOTAL UNDECLARED SURPLUS PROPERTIES 372**

# EXHIBIT H

Exhibit H is related to Comment GO14-58. This Exhibit material was considered in the Response to Comment GO14-58.



# **LOS ANGELES AERIAL RAPID TRANSIT**

**RESPONSE TO METRO REQUEST FOR INFORMATION**

SEPTEMBER 2018

# AERIAL RAPID TRANSIT TECHNOLOGIES LLC

700 S. Flower Street, Suite 2995  
Los Angeles, CA 90017  
310.751.3480 | [www.aerialrapidtransit.la](http://www.aerialrapidtransit.la)

September 26, 2018

Dr. Joshua L. Schank  
Chief Innovation Officer  
Office of Extraordinary Innovation  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012

Re: Aerial Rapid Transit System from Union Station to the Dodger Stadium Property:  
ARTT LLC's Response to Metro's Request for Information

Dear Dr. Schank:

We are very pleased to submit, on behalf of Aerial Rapid Transit Technologies LLC, this response to Metro's Request for Information concerning the Los Angeles Aerial Rapid Transit system to connect Los Angeles Union Station with the Dodger Stadium property. As stated in our Unsolicited Proposal Phase I submission, ARTT LLC will finance, design, build, operate, and maintain this Project. While not requesting funding from Metro, we believe cooperation is essential and will result in tremendous positives for the public including environmental progress toward meeting clean air goals. ARTT LLC is willing to reimburse Metro's staff costs to assist in the Project's review process, and we look forward to working with you to transform this vision into reality as soon as possible.

The ART connection to Union Station will provide direct benefits to Metro, its passengers, and community stakeholders. The ART will increase transit ridership including for "choice" riders through direct access from Union Station with convenient connections to the Metro system and Metrolink trains at the region's transportation hub. For passengers, the Project will introduce a new, high quality, quick and exciting rapid transportation experience, with a travel time of about 5 minutes from Union Station to Dodger Stadium. For neighbors, the Project will be a community benefit as it will reduce the event-related traffic on the roads in and around Dodger Stadium property and surrounding areas, improving air quality, reducing noise, and increasing safety. The Project is also consistent with Metro's Core Business Goals including to:

- Promote extraordinary innovation;
- Exercise fiscal discipline to ensure financial stability;
- Improve the customer experience and expand access to transportation choices;  
and
- Increase transit use and ridership.

ARTT LLC is anxious to advance this Project expeditiously and is eager to work with Metro as a willing partner to demonstrate that innovative, clean energy, sustainable, privately funded transportation can be made available to Los Angeles in harmony with publicly funded infrastructure. Since our Phase I submission on April 25, 2018, we have been eager to proceed and hereby provide a complete response to your August 2018 Request for Information ("RFI"),



together with proposed next steps for working together. An agreement with Metro for immediate implementation is important to assure that Metro and ARTT LLC are aligned in the objective of delivering this outstanding Project as soon as possible. We respectfully request that Metro work with us to achieve agreement on next steps for proceeding by the end of October 2018.

We are encouraged that Metro's RFI stated that "The Review Team expressed unanimous interest in gathering more information about this proposal," and believe we can form an innovative, mobility partnership that will meet the goals of Metro and ARTT LLC and provide Dodger fans with a permanent rapid transit link at the earliest feasible date. We look forward to moving forward with Metro.

Sincerely,

A handwritten signature in black ink, appearing to read "Martha Welborne". The signature is fluid and cursive, with the first name "Martha" being more prominent than the last name "Welborne".

Martha Welborne, Project Director  
Aerial Rapid Transit Technologies LLC

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ART Capitalized Project Cost Estimate	
Draft Term Sheet for an Exclusive Negotiation Agreement	



**Metro**

Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

**This Request for Additional Detailed Information, its Attachments, and any response to it are Strictly Confidential.**

Unsolicited Proposal – Phase II Detailed Review: Response to Request for Information

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## **PROJECT INFORMATION**

*To be completed by Metro Staff*

**Project Name:** Los Angeles Aerial Rapid Transit (LAART) Project ID: UP-2018-14

**Date Submitted:** 25 April 2018

**Date Received:** 25 April 2018

**Phase I Response Date:** 11 June 2018 Phase II RFI issuance: 10 August 2018

**Requested Response Date:** 12 November 2018 Review Team:

- Program Management
- Countywide Planning
- Operations
- Vendor/Contract Management
- Office of Civil Rights
- Office of Extraordinary Innovation

**Response Date:** 26 September 2018

## **SUMMARY OF PHASE I PROJECT EVALUATION**

The Review Team expressed unanimous interest in gathering more information about this proposal and expressed openness to the three main areas of Metro involvement laid out in the Phase I proposal (location at Los Angeles Union Station (LAUS), responsibility as lead environmental agency, and assistance with aerial easements and land acquisitions) (p. 14).

**RESPONSE:** Thank you for the opportunity to provide more detail regarding the proposed Los Angeles Aerial Rapid Transit system (“ART” or “the Project”). Aerial Rapid Transit Technologies LLC proposed a unique, innovative partnership with Metro in its Phase I Unsolicited Proposal submitted on April 25, 2018, to fund/finance, design, construct, operate, and maintain the Project at no cost to Metro. Recognizing that Metro’s ability to implement expansions to the region’s transit system is usually limited by the availability of public funding, we believe that this Project presents Metro with an unusual opportunity to demonstrate the feasibility of a self-funded innovative transit partnership that provides significant public benefits. We appreciate Metro’s openness to assisting in three areas as detailed below and hope we can proceed as soon as possible to enter into necessary and appropriate agreements with Metro to move forward together.

The discussion then focused on the costs, impacts and benefits of this project, and what role Metro would play should the proposal advance to implementation, as it influences what information to request.

#### The costs, benefits and impacts of this project

The review team had some concerns whether this project would deliver noteworthy benefits to local and/or regional mobility, air quality and congestion compared to other potential investments (p. 12). However, the review team discussed other benefits, such as the significant investment being made by the developer, and the intangible benefits of this project as a fun and iconic local attraction that captures the public imagination and instills a sense of civic pride.

This project has the potential to create positive net benefits for the people of Los Angeles County. For its involvement and whenever possible, Metro must work to prevent any potentially negative impacts to the people of Los Angeles County and deliver value to the people of Los Angeles County. This includes maximizing the return on investment of the taxpayers who invest in Metro’s mission.

There are aspects of this project and the role Metro is being asked to play that will have a cost to Metro and the people of Los Angeles County. These may include the social and political costs of acquiring property; the impacts of construction on local communities; acting as the face of the project and mediating opposition; the opportunity costs of expending limited resources and capacity; and the impact of allowing for an additional transit use on the Union Station property given the myriad of projects, both transit and commercial, in early stages of development. To the extent that Metro will be environmentally clearing the project, claiming property, and substantially involved in other ways, the reputational risks of problems that arise on the project such as delays, mismanagement, or operational incidents, also reflect Metro even if Metro is not paying for the project.

While the risks of this project to Metro and the people of Los Angeles County are lower than most of Metro’s planned capital projects, every project has risks that must be explored to ensure that the benefits of the project outweigh those risks. The review team saw great advantages to this investment in the connection between two iconic Los Angeles destinations, but because of the risks, Metro is interested in understanding how risks can be minimized and value can be maximized.

#### The role Metro would play

The review team felt that it would be advantageous to simplify Metro’s role as much as possible, and to focus this Request for Additional Detailed Information (RFI) on understanding the Project assumptions (ridership, site needs, and similar) to inform the environmental process; the business case for Metro; the role Metro would play; the long-term vision for the project; and the project’s interface with Los Angeles Union Station.

Because this project is unprecedented, Metro must answer interrelated questions surrounding how the project would be structured, what Metro policies and procedures would apply, what contractual vehicle would be used, which entities will be involved and in what ways, etc. As Metro collects additional information on this project, it will continue to refine its position on many of these key questions. This RFI invites the proposer to weigh in on these questions as well, and feels that the earlier the answers can be understood and agreed upon, the better.

**RESPONSE:** We agree wholeheartedly that the earlier the better to resolve these key questions and, in particular, the ARTT LLC team is eager to commence face-to-face discussions with Metro staff to work through these items. During the months that have passed since submittal of our Unsolicited Proposal, the team has completed significant additional work to facilitate the Project and regrets the inability to communicate directly with staff due to the “blackout period” that has continued because a sole source determination has not been made.

Moreover, since ARTT LLC has expended very significant funds, a prompt decision on the sole source issue is important to inform its continued investment decisions. As set forth in our Phase I Unsolicited Proposal, ARTT LLC has a unique ability to provide the Project, including essential proprietary information.

- ARTT LLC has a unique ability to deliver the Project, including the necessary station location at the Dodger Stadium property and proprietary information that is required. The Unsolicited Proposal Policy explains that if an unsolicited proposal offers a proprietary concept that is essential to contract performance, it will be deemed “sole source.” The ability to provide land where a proposed ART station would be located at the Dodger Stadium property, and to obtain private financing for the Project, is integral to the success and viability of this proposal.
- Proprietary information is essential to contract performance and qualifies the ART for a sole source award. Proprietary information essential to accomplishing the Project includes, but is not limited to: information to support travel planning for Dodger employees and game attendees, rideshare usage information, and parking lot usage information; and ability to develop and implement necessary coordination with the Dodger ticketing system and strategies to coordinate with ART ticketing for Stadium events.
- Competitive solicitation should not be required before agreements are entered into between Metro and ARTT LLC. The Unsolicited Proposal Policy indicates that Metro must undergo the competitive solicitation process only before entering into a competitive procurement contract. Metro’s ordinance governing contractor prequalification makes clear that it does not apply to contracts where there is only one source for the necessary services. (See Section 4-05-070 G.) Here, public funds are not being requested, and the contractor prequalification ordinance only applies to contracts with over \$100,000 to be expended by Metro. (See Section 4-05-030 C.) In addition, the ordinance governing contractor prequalification does not apply to real estate lease agreements, such as an agreement if ARTT LLC leases Metro property for an ART station. (See Section 4-05-070 F.)

### The role of this RFI

This RFI requests a substantial amount of supplemental information, and in doing so, makes some assumptions. The reason for asking for such information is to receive the most complete Phase II proposal possible. The more defined the project at the end of Phase II, the more confidently Metro can make its decision to implement the project, and in what manner.

Most of the information requested in Section 3 of this RFI is requested for the following reasons:

To move forward with providing a location at LAUS, Metro needs to understand where the station will go and the potential impacts to projects, parking, and facility use.

To move the project smoothly through the environmental process, Metro needs project details and to understand which policies the proposer believes apply.

To approve the project, Metro needs to ensure the project will be insured and constructed to applicable codes and specifications, and that the proposer has a sound funding plan and business model.

To move from Phase II to implementation, Metro prefers to have as much project definition as is practicable.

If information requested will not be known or available in Phase II, the proposer should explain its reasoning as well as at what point during the process the information would become available.

## **Purpose of this Document**

The purpose of this Request for Information (RFI) is to gain greater understanding of your firm's Unsolicited Proposal and enable Metro to conduct a Phase II Detailed Review of your proposal. It also allows Metro to communicate key needs, challenges, opportunities, and aspirations in a way that should allow you to reiterate your proposal to more adequately fit these parameters.

This RFI will serve as a tool to gather more information about the conceptual proposal to aid Metro's Review Team in making a Phase II determination. The RFI is drafted based on the feasibility assessment previously conducted and approved for the project during the Phase I Review. *The information you provide to respond to this request should help Metro to understand the business case for implementation of your proposal.*

If Metro ultimately chooses to advance your Proposal, and to issue procurement documents, the information provided in response to this RFI will strengthen the procurement document (whether RFP or sole source). Any information received in response to this RFI may assist Metro's Unsolicited Proposal Review Team, Office of Extraordinary Innovation, and Office of Vendor/Contract Management in finalizing the scope of work and requirements which may be used at a future date in the issuance of a Request for Proposals (RFP), or other contracting mechanism. Submitting a response to this RFI is not a guarantee in any way that a supplier will be selected for any subsequent RFP or contracting mechanism, nor does it preclude any supplier from responding to future procurement opportunities.

The issuance of this RFI does not constitute a commitment to issue a request for bids/proposals, award a contract, or pay any costs incurred in preparation of a response to this RFI. Cost and price information provided in proposals will be held in confidence and will not be revealed or discussed with competitors, except to the extent required by law.

## PART I: PROBLEM STATEMENT AND KEY REQUIREMENTS

*To Be Completed by Metro Staff*

### I. Problem Statement

*Describe the gap/problem(s), its magnitude (i.e., which mission/functional areas, people, organizations, processes, etc. are affected) and the primary mission or business impacts if not corrected.*

Sports venues draw large crowds that overwhelm transportation systems before and after events. Because Dodger Stadium is the largest Major League Baseball stadium (capacity 56,000), is located on a hill in Chavez Ravine, is adjacent to several bustling neighborhoods, and sits within traffic congested Los Angeles, traffic getting to and from Dodger Stadium is notoriously challenging. Dodger Stadium draws regional crowds, the vast majority of whom drive their personal vehicles to access the venue.

These vehicles converge and bottleneck on the surface streets leading up the Stadium, especially Sunset Boulevard/Cesar Chavez from Union Station and into the communities West of Echo Park. This traffic is exacerbated by a lack of high-quality transit options which could more efficiently shepherd people in and out.

As part of the Phase II response, Metro would benefit from hearing more about how the proposer defines the problem statement and solution.

**RESPONSE:** We agree with Metro's summary above of the current conditions that exist in terms of congestion resulting from personal vehicles as the primary means of access to Dodger Stadium, which with 56,000 seats and approximately 100 baseball games and other events each year continues to set records for annual attendance. In addition to improving the congestion that impacts local streets, the creation of the ART presents the opportunity to reduce air quality impacts resulting from such vehicular traffic. Moreover, congestion occurs on the freeways around Downtown including the I 10 Freeway, which impacts commuters and other travelers. If not improved through implementation of the ART system, as the region's population growth and resulting travel needs continue to increase over time, this local and regional roadway system is likely to experience greater congestion.

In terms of the solution, our proposal presents the potential for "triple bottom-line" benefits to reducing congestion around Dodger Stadium: the Project provides economic, environmental, and social equity benefits, consistent with Metro's mission of bringing mobility choice to all parts of Los Angeles County.

As to economics, ARTT LLC is committed to fully fund/finance ART. As Metro continues to expand the transit system throughout the region, there are no existing or proposed plans for providing permanent transit connections to Dodger Stadium. Metro's capacity to expand access is constrained by funding commitments. ARTT LLC's commitment provides an economic upside to Metro as the Project will be completed at no cost to Metro and both fulfills Metro's purpose/mission and provides Metro with economic benefits in the form of new "choice riders" who will gain exposure to the Metro system through a high-quality experience connecting to Dodger Stadium. As a UCLA study earlier this year concluded, attracting such ridership even several times per month offers tremendous benefits to Metro and the region.

Second, there is an environmental cost to the current access system. It is felt by residents and businesses in and around this immediate geography, as well as by the fans trying to get to and from an



event. Traffic congestion, air pollution from vehicles, noise, and safety concerns with the number of cars in neighborhoods all contribute to environmental impact.

Third, the surrounding communities are neighborhoods that are already environmentally impacted as detailed in the metrics of CalEnviroScreen 3.0 (Office of Environmental Health Hazard Assessment). These neighborhoods are in close proximity to major freeways, the SR-110 and the US-101, as well as heavily congested arterials (Sunset Boulevard) that create both safety and air quality issues.

ART contributes to Metro's mission of providing transportation services – indeed, economical and environmentally compatible mobility *choices* – and provides an excellent return on taxpayer investment for Metro as there are no Metro funds being requested or required for any aspect of the implementation, operation, and maintenance of ART service. ARTT LLC envisions that a round trip ride on ART will cost less than the average parking costs at the stadium. Together with expected ridership from other visitors including tourism on non-game days, farebox revenue can finance the Project while reducing the cost of transportation in comparison to private vehicles. This is a further incentive to drivers to choose “transit first.”

ART is environmentally friendly. With a carrying capacity of at least 5,000 people per hour per direction (much higher than that of buses), ART can change environmental outcomes by providing a much higher capacity and quality transport experience – and one that is an attraction in and of itself – for Metro riders. In the two-hour timeframe before a Dodger game, ART can carry more than 10,000 people; based on current average vehicle ridership to Dodger Stadium, this will eliminate roughly 3,200 cars from local and regional roads (or 6,400 trips per game or event). These mode-shift benefits are accentuated by the fact that ART is an all-electric transportation mode, which replaces automobiles, most of which use carbon fuels.

ART opens up access and mobility to this major event venue for the whole region, while providing a localized investment that brings equitable benefits to the neighborhoods surrounding the Dodger Stadium property. Given the wonderful renaissance an “accessible Los Angeles” is undertaking with Metro's transit expansion, Angelenos and Southern Californians from all corners of our region can experience “getting there” to a Dodger game in style via Metro and ART. Given that Staples, the Coliseum, and other sports venues have viable transit options, it is time for fans heading to Dodger Stadium, which is identified with Los Angeles all over the world, to have 21<sup>st</sup> century mobility choices.

ARTT LLC envisions a more holistic aspect to providing the ART as alternative mobility and access to Dodger Stadium than just being for fans. The Project underscores a triple bottom-line approach to community-building and civic structure in the second largest city in the country.

## **2. Background and Context**

*Provide additional context that explains the current situation (e.g., policy, process, environmental factors). Identify root causes (if known) and contributors to the observed problem(s). Include relevant research and information on industry or market conditions as appropriate. Keep the focus strategic.*

### **Metro's Responsibility**

Because this project is envisioned to be privately designed, built, operated, maintained, funded, insured, and financed, Metro does not envision taking a hands-on, prescriptive, or performance minded approach to this project, instead focusing on the elements of the project for which Metro would be responsible.

Under the structure proposed in Phase I, Metro still needs additional information about each of the above-mentioned aspects of the project to better understand and evaluate it, the case for it, and its impacts, and in order to serve as the agency lead on environmental planning and clearance. Metro also has a significant interest and role to play as the property owner of the LAUS site and a steward of taxpayer investment, which includes better understanding the station location, impact to the immediate site and LAUS facilities, and feedback/approval rights of station designs and operating plans.

For the purposes of this RFI, Metro intends to focus its involvement, and its questions, on the following categories:

1. Metro's mission, financial and business interests, including its role in improving mobility and providing transportation services and return on taxpayer investment for Los Angeles County

**RESPONSE:** As detailed in the response to Part II, Executive Summary, ART is consistent with Metro's goals and objectives, including advancing the following Metro Core Business Goals: promote extraordinary innovation, exercise fiscal discipline to ensure financial stability, improve the customer experience and expand access to transportation choices, and increase transit use and ridership.

2. Metro's role as the lead agency during the environmental review (California Environmental Quality Act) process, for which it will be helpful to have a better understanding of future development plans at Dodger Stadium and/or associated projects; project design and definition; and assumptions and their basis.

**RESPONSE:** As further detailed below, ARTT LLC seeks Metro's assistance in three specific areas: potential location of the ART station at Union Station; to act as Lead Agency for environmental clearance; and to potentially assist with matters related to surface land acquisition and aerial easements, as needed. ARTT LLC shall cover the costs associated with the preparation and certification of any required environmental documents including an EIR under CEQA. ARTT LLC shall arrange and pay for all required CEQA studies and reviews at its sole costs and expense. ARTT LLC is also willing to reimburse Metro for its staff costs.

3. Metro's role in acquiring property for this project, per CPUC's explanation of the "Powers and Functions of District"

**RESPONSE:** ARTT LLC intends to use its best efforts to acquire public right of way and private land and aerial easements. In the event that ARTT LLC needs Metro's assistance in said acquisition, it is anticipated that Metro would utilize the powers provided it by California Public Utilities Code (CPUC) Division 19, "Local Transportation Authorities", Chapter 4, "Powers and Functions". CPUC Section 180152 specifically states:

The authority may make contracts and enter into stipulations of any nature whatsoever, either in connection with eminent domain proceedings or otherwise, including, but not limited to, contracts and stipulations to indemnify and hold harmless, to employ labor, and to do all acts necessary and convenient for the full exercise of the powers granted in this division.

In addition, Division 10, "Transit Districts", Part 3, "Southern California Rapid Transit District", Chapter 5, Powers and Functions of District, Section 30600 states:

The district may take by grant, purchase, gift, devise, or lease, or by condemnation, or otherwise acquire, and hold and enjoy, real and personal property of every kind within or

without the district necessary or incidental to the full or convenient exercise of its powers. That property includes, but is not limited to, property necessary for, incidental to, or convenient for joint development and property physically or functionally related to rapid transit service or facilities. The board may lease, sell, jointly develop, or otherwise dispose of any real or personal property within or without the district when, in its judgment, it is for the best interests of the district so to do.

4. Metro's role in approving this project, per CPUC § 130252

**RESPONSE:** See response to Part I, 5 as to Metro's role in approving the Project pursuant to CPUC Section 130252.

5. Current and future plans for Los Angeles Union Station, impacts, and associated concerns as property owner of this regional hub.

**RESPONSE:** As detailed in Part II, 4, as to property and facilities, ARTT LLC has identified two potential station locations at or near Union Station: Metro's identified "Development Site C" and over Alameda Street near Union Station. If Development Site C is selected, ARTT LLC would seek a ground lease with Metro for the ART. For any station location at or near Union Station, ARTT LLC would coordinate with Metro concerning pedestrian access to the station.

We understand that Metro is currently undergoing final design for the LAUS Forecourt and Esplanade improvements. ARTT LLC will work with Metro to ensure that the ART station located at or near LAUS will be consistent with improvements to the Forecourt and Esplanade.

#### LAUS Spatial Context

*Information about ongoing and planned projects for LAUS are included in Attachment J*

### **3. Functional Requirements**

*Summarize functional requirements. Focus particularly on requirements necessary to achieve desired outcomes and measurable performance objectives.*

#### Planning

- The proposal should describe the impacts of the project to Metro and LAUS throughout the lifecycle of the project
- The project should include a conceptual project plan, as well as a high-level schedule, scope and budget, or an explanation of when this information would become available in relation to environmental clearance and/or negotiations
- The proposal should describe the footprint of the facilities, including how much space would be needed for a station, where the preferred station sites are located, and why. The proposal should show how each station area would influence the alignment alternatives. If the alignment alternatives are well known, the proposer should provide some insight into how many properties and aerial easements may need to be acquired, which properties may need to be acquired or operated above, and for what reason.
- The proposal should describe Aerial Rapid Transit Technologies (ARTT), LLC's preferred approach to the environmental process, including but not limited to alternatives analysis, visual impacts, technical analysis, emergency response, feasibility, impact to parking, etc. This should include an interpretation of whether site/economic development plans that rely on this project

will also need to be environmentally cleared, and if their clearance would occur separately from this project. With this in mind, the proposal should include any information relevant to the environmental process.

**RESPONSE:** We look forward to working with Metro staff to conduct the scoping process consistent with CEQA to determine the issues to be analyzed in the environmental review, and also assess any federal issues and whether a FONSI under NEPA will also be likely to be needed. We agree that route alternatives should be studied. As to the question of site/economic development plans that rely on this Project, the only elements we have identified for analysis are the stations, together with the aerial easement and tower locations. Any impacts at Union Station should be studied as appropriate and similarly, for the station at the Dodger Stadium property, we anticipate the City will require a Plan Approval under the Dodger Stadium Conditional Use Permit as it does for other improvements that serve the existing stadium uses.

- The proposal should explain which Metro policies ARTT believes should not apply to this project, be waived or granted exemption, or would conflict with this project, and why; a worksheet template has been included in Attachment B.

**RESPONSE:** This policy explanation is provided in Part I, 4.

- The proposal should indicate what coordination would be required with other jurisdictions, such as the City of Los Angeles and Caltrans, and who would be responsible for that coordination and its associated outcomes

**RESPONSE:** ARTT LLC will coordinate with the City of Los Angeles regarding any approvals to operate the ART system on and over City streets and rights of way. Additionally, the ART will cross State Route 110 (“SR-110”), which is under the jurisdiction of the State of California Department of Transportation (“Caltrans”). As such, while ARTT LLC will coordinate with Metro as appropriate, we anticipate working directly with Caltrans on any required reviews and approvals for said crossing.

- The proposal should validate its assumptions, whenever possible corroborating assumptions with comparable, existing projects

**RESPONSE:** Information is included in Part II as to relevant experience from other, existing aerial systems.

- The proposal should not assume that Metro’s Dodger Stadium Express would continue to operate when an aerial tram began serving Dodger Stadium (see attachments G and H for more information on the Dodger Stadium Express)

**RESPONSE:** We recognize that it will be Metro’s determination whether to continue operating the Dodger Stadium Express. The Los Angeles Dodgers would welcome the continued operation of both systems. In addition, we note that the current funding for the Dodger Stadium Express comes from air quality related sources and, if the ART replaces that system, should be considered as funding sources for Metro’s Union Station-related operating costs for the ART.

- The proposal should assume that if the project were to proceed on the LAUS property, Metro would be involved in community engagement, outreach, and construction relations and mitigations, and should explain ARTT, LLC’s approach to community outreach, including what, if any, outreach would be done, and by whom, during the environmental review process.

**RESPONSE:** We welcome working with Metro on these issues and seek to discuss, as soon as possible, how Metro would like to address these issues. Our working assumption has been that

environmental and community relations consultants would be retained who are deemed qualified by Metro and that ARTT LLC and Metro would work together on managing these processes. As stated in the initial proposal, ARTT LLC is also willing to reimburse Metro for its staff costs. We also seek to complete a services agreement with Metro to identify the time required so that prompt and efficient progress can be made together.

- Based on ridership assumptions, how much parking would the project require and where is the parking assumed to be?

**RESPONSE:** We anticipate that this issue would be studied further as part of the environmental review following agreement with Metro on a services agreement. ARTT LLC and the Los Angeles Dodgers would work together to encourage ART users to utilize Metro to get to Union Station and transfer from transit to the ART. In addition, we would encourage ART riders to enjoy local restaurant and entertainment opportunities before and after taking the ART.

- The proposer should consider if the project could/might create transit connectivity or walkability between the north and south sides of the Gold Line tracks near Los Angeles Historic Park

**RESPONSE:** We agree, and at least one ART route based on our initial studies would provide such connectivity.

- The proposer should indicate whether they would prefer that TAP be available as a form of payment

**RESPONSE:** Our initial thinking is that options would be available for ticket purchase, including that ART fare would be packaged with a Dodger Stadium admission ticket and electronically available to each rider who is attending a game or event at Dodger Stadium. Where an ART rider is not attending a game, other fares options would be available. We agree that policies should be developed with Metro to encourage transfers from other modes of Metro transit, and look forward to further collaborating with Metro on fare type.

#### Business Model and Finance

- The business plan should be informed by the planning assumptions above, and outline the following:
  - Business model

**RESPONSE:** ARTT LLC has identified funding for the initial phases of the project through permitting; at that time, the market offers availability of third-party private financing for the capital construction cost of the Project as proposed. The revenue analysis conducted to date by ARTT LLC indicate that funds available from the private operation and maintenance of the ART system are sufficient for operating costs and debt service, based on the current project budget, and will be further refined as the project proceeds. See Part II, II for additional detail.

- Project budget and the available funding envelope for the project

**RESPONSE:** See Part II, II for additional detail.

- Future plans at Dodger Stadium site

**RESPONSE:** The only plan for Dodger Stadium related to the ART is to provide a station on the Dodger Stadium property, together with appropriate pedestrian connections from the station to the stadium. As noted above, we anticipate the City will require a Project Approval under the existing Dodger Stadium Conditional Use Permit for the details of this station. The station will occupy land currently utilized for parking and will reduce parking revenue to the property owners.

- How would Metro be compensated for using Metro-owned land and facilities and Metro's authority, for company profit? This should include consideration of assumptions on ground lease payments and/or revenue sharing and/or usage fees, and any other financial payment to Metro for use of the Union Station site and facilities as part of a negotiated agreement; as well as other Metro responsibilities such as right of way acquisition, staff time, etc.

**RESPONSE:** The Project will invest and risk private funds in order to provide a transportation connection open to the public, with the environmental and other benefits noted above. We believe assisting such benefits to be delivered without cost to Metro is completely appropriate for Metro's mission. We look forward to the ability to commence discussions with Metro on the potential for use of its facilities and associated costs. As noted above, our intent is to reimburse Metro for staff time. All of these issues can be addressed when discussions can commence, and a proposed term sheet for an Exclusive Negotiation Agreement is enclosed. As noted above, to the extent Metro needs to make decisions as to sole source prior to addressing all of these issues, we respectfully request that such a decision be made.

- Staffing assumptions throughout the lifecycle of the project
  - The proposal should include the expected level and number of Metro Full Time Equivalent staff (FTEs), and percentage of staff time required and the proposed considerations related to reimbursement
  - The proposal should propose how the environmental contractor would be procured, if determined by the proposer, and how ARTT would procure these services

**RESPONSE:** As described above, we anticipate this process would be similar to other Metro environmental projects, and our team includes the former Chief Planning Officer of Metro who has extensive experience with such projects. We look forward to discussing the proposed scope of the CEQA review with Metro staff so the staffing determinations can be made. As to the EIR preparer, we anticipate working with Metro to select a contractor that is deemed qualified by Metro at ARTT LLC's cost.

- The proposal should include proposed staffing assumptions of additional Union Station personnel required in support of, but not direct operation of, the tram

**RESPONSE:** We do not anticipate the need for such personnel, but would welcome the opportunity to understand Metro's perspective on the potential for such needs.

- The proposal should directly acknowledge that financing, funding, and insuring the project and its operation will be the responsibility of Aerial Rapid Transit Technologies, LLC and its partners, including decommissioning and deconstruction of the facilities should they become non-operational

**RESPONSE:** This acknowledgement is included in Part IV.

- The proposal should include letters of interest from key financial partners

**RESPONSE:** ARTT LLC has the necessary financial resources to fund the Project and is planning to do so through environmental review and permitting, at that time, the market offers availability of third-party private financing for the capital construction cost of the Project as proposed, so ARTT LLC can assess whether additional financial partners may become involved. At the present time, it is important to receive confirmation from Metro of its willingness to assist through reaching agreements that allow the Project to publicly demonstrate its ability to proceed with permitting.

- The proposal should include a term sheet

**RESPONSE:** A term sheet for an Exclusive Negotiation Agreement is included.

- The proposal should explain how the proposer would indemnify Metro from any and all liabilities that may result from the environmental process through construction, operation and decommissioning of the project by a private party.

**RESPONSE:** Such an indemnification will be included in agreements with Metro.

#### Operations

- The proposal should indicate the level of service expected to run, and how changes to levels of service impact relevant requirements above
- The proposal should comment on the capacity of the system and anticipated wait times during peak loads
- The proposal shall address how ADA compliance will be achieved, and identify any impacts on proposed capacity

**RESPONSE:** Operational information is included in Part II, 1, 2, and 4.

This response addresses Metro's identified functional requirements, including planning, ARTT's business model and financing, and ART's proposed operations.

#### **4. Statutory, Regulatory and other Compliance Requirements**

*Identify any statutory, regulatory, compliance requirements and/or organizational strategic goals and objectives this project/initiative must satisfy. Include as a reference all known statutory and regulatory requirements.*

In this RFI, Metro has included a list of policies and laws that it believes may apply to this project. This list is not intended to be comprehensive, nor does it intend to be binding. Attachment B includes a worksheet in which the proposer can describe various policies and laws, including those listed below, and explain whether they consider them applicable and why or why not.

#### Laws and Policies

- [Americans with Disabilities Act](#)
- Metro Adjacent Development Handbook and Adjacent Construction Design Manual (Attachments D, E, F)
- [Metro Green Construction Policy](#)

- [Construction Careers Policy](#)
- The proposal should outline the preliminary terms of a [Project Labor Agreement](#) (PLA) to which LAART would commit, or otherwise argue that the PLA is not applicable to this project
- The review team recommends adherence to the American National Standards Institute (ANSI) Ropeway Standard as best practice (Attachment I)
- Metro Equity Platform Framework (Attachment C)
- LAUS Agreements (Covenants, Conditions & Restrictions and Easement Agreements between LACMTA, MWD, First 5 LA and Mozaic Apartments) to be provided should a formal agreement be entered between LACMTA and ARTT LLC.)
- Laws, policies and procedures associated with crossing freeways, if applicable
- Laws, policies and procedures associated with operating ropeways in California

On Metro projects, Metro follows these Fire/Life Safety Policies:

- National Fire Protection Association NFPA 130 Standard for Fixed Guideway Transit and Passenger Rail Systems
- NFPA 101 Life Safety Code
- NFPA 70 National Electric Code
- NFPA 72 National Fire Alarm Code
- Los Angeles Fire Department Chief's Regulation #4 Standards
- Long Beach Fire Department Fire Protection and Life Safety Certification Program
- Metro Fire/Life Safety Design Criteria

### Approval from the Board of Directors

Based on Metro's interpretation of its authority under the CPUC, which establishes Metro and its powers, including the powers of eminent domain, the Metro Board of Directors must approve all plans for the design, construction and implementation of public mass transit projects in LA County, including this one.

### Rationale

PUC § 130252 states, in relevant part: "All plans proposed for the design, construction, and implementation of public mass transit systems or projects, including exclusive public mass transit guideway systems or projects . . . shall be submitted to the commission [now Metro] for approval. No such plan shall be approved unless it conforms to the appropriate adopted regional transportation plan . . ."

CPUC General Order 164-3 (Eff. 01 May 2018) further defines its authority over Rail Fixed Guideway System, which are defined as "any light, heavy, or rapid rail system, monorail, inclined plane, funicular, trolley, cable car, automatic people mover, or automated guideway transit system used for public transit and not regulated by the Federal Railroad Administration or not specifically exempted by statute from Commission oversight."

Based on these code sections, the Aerial Tram from LAUS to Dodger Stadium is a public mass transit project, and therefore Metro must approve all plans for its design, construction, and implementation.

Metro is also the statutory designated transit guideway operator in Los Angeles County (see, PUC §130254), although Metro is likely able to delegate this function to a third party.



## **RESPONSE:**

### Law and Policies

The ART system will comply with all laws, policies, and procedures applicable to aerial gondola systems. For statutory, regulatory or policy requirements that may be applicable to the Project, please see Appendix B regarding compliance. ARTT LLC will follow Metro's Equity Platform Framework guidelines. ARTT LLC will have a Project Labor Agreement (PLA) consistent with Metro requirements for the Project. ARTT LLC will review Covenants, Conditions & Restrictions and Easement Agreements between LACMTA, MWD, First 5 LA, and Mozaic Apartments when provided by Metro and will work with Metro to address any issues related to ART and the aforementioned Agreements, as necessary and appropriate.

ARTT LLC will coordinate with the City of Los Angeles regarding any approvals to operate the ART system on and over City streets and rights of way. Additionally, the ART will cross State Route 110 ("SR-110"), which is under the jurisdiction of the State of California Department of Transportation ("Caltrans"). As such, ARTT LLC will directly coordinate with Caltrans on any required reviews and approvals for said crossing. ARTT LLC will also coordinate with Metro on these matters, recognizing Metro's existing relationships with both the City and Caltrans.

### Approval from the Board of Directors

ARTT LLC will comply with applicable statutory requirements related to the design, construction, operation, and maintenance of an aerial gondola system. In response to Metro's assertion that ART is subject to Metro approval under the requirements of the California Public Utilities Code ("CPUC"), ARTT LLC agrees in general that such approval is appropriate since ARTT LLC has asked Metro to act as the Lead Agency for environmental clearance, together with assistance with the acquisition of surface land and/or aerial easements, as necessary, and the potential location of a passenger station at or near Los Angeles Union Station. We do ask Metro to recognize, however, that aerial gondolas and tramways are regulated by the California Labor Code, Sections 7340-7357, and the detailed implementation of design, plans, and specifications falls under the jurisdiction of the Department of Industrial Relations, Division of Occupational Safety and Health ("Cal/OSHA"), which includes an Amusement Ride and Tramway Unit.

Cal/OSHA's Amusement Ride and Tramway Unit utilizes the American National Standards Institute ("ANSI") for aerial gondola and tram systems. ARTT LLC's aerial gondola engineer, Engineering Specialties Group, serves as technical advisor to ANSI in the development and updating of ropeway system standards, thus ARTT LLC will have the most up-to-date standards and requirements expertise in the design and construction of the Project.

We look forward to further discussion with Metro to clarify the roles of various agencies. Because aerial transit is specifically regulated by the Department of Industrial Relations, Cal/OSHA, oversight comes from that agency rather than from the CPUC directly. This regulatory structure has been used in the recently opened Salesforce Tower tram in San Francisco, which contains an aerial transport system reviewed by the Amusement Ride and Tramway Unit.

Unlike other Metro projects, the ART is a privately funded/financed, designed, built, operated, maintained, and insured transport conveyance to a private property that is open to the public. Like Dodger Stadium, the ART system will be open to the public for certain events and activities but not publicly owned. It is more akin to the Palm Springs Aerial Tram as a service provided for transportation to a specific location. In response to Metro's interpretation that CPUC Section 130252 is

applicable to the ART, we note that CPUC Section 130252(a) also refers specifically to “public mass transit” and “exclusive public mass transit guideway” systems or projects: “ “All plans proposed for the design, construction, and implementation of public mass transit systems or projects, including exclusive public mass transit guideway systems or projects [] shall be submitted to [Metro] for approval. ART is not a “transit guideway system”. As described in CPUC General Order 164-E, “Rules and Regulations Governing State Safety Oversight of Rail Fixed Guideway Systems”, transit guideway systems are not defined (see Section 2.22 in the General Order) to specifically include “aerial ropeway systems”. These systems are specifically called out in state statute as being under the jurisdiction of the Department of Industrial Relations, Cal/OSHA.

## 5. Technical Requirements or Limitations

*Identify any technical requirements or limitations.*

- The station site may not interfere with planned capital projects outlined in this RFI and Attachment J

*For the purposes of continuity, some Technical Requirements were included in the Functional Requirements section*

**RESPONSE:** As detailed in the response, ARTT LLC will deliver added transit without interfering with Metro’s capital program and will support Metro’s continued nationwide leadership in mobility innovation.

## 6. Other Project Information

*Identify any other relevant project information.*

**RESPONSE:** N/A

Attachments:

Attachment A – LAUS Master Development Site Maps  
Attachment B – Applicable Policies and Laws worksheet  
Attachment C – Metro Equity Platform Framework  
Attachment D – Metro Adjacent Development handbook  
Attachment E – Metro Adjacent Construction Design Manual  
Attachment F – Metro Adjacent Development Review Intake Form  
Attachment G – Dodger Stadium Express Overview  
Attachment H – Dodger Stadium Express Survey 1 & 2  
Attachment I – ANSI Ropeways in Urban Transport  
Attachment J – LAUS Spatial Context  
Attachment K – CalOSHA Guidelines for the submission of designed, plans and specifications prior to the construction of new, relocated or modified passenger tramways

## PART II. PROJECT DESCRIPTION AND PERFORMANCE OUTCOMES

*To Be Completed by Applicant*

### EXECUTIVE SUMMARY

*Please provide a synopsis of the key points of the business case for your proposal. This should include an outline of the solution/service to be obtained and your expectations regarding the potential partnership. Your summary should briefly touch on:*

- What the project or service entails
- Boundaries/scope of the project -- what is included and excluded
- What benefits the project or service will provide to Metro and/or our customers/taxpayers
- How the project or service aligns with the goals and objectives of the organization
- Details regarding regulatory and/or statutory compliance
- Estimated costs and potential for cost sharing
- Minimum viable product/project size and the potential to scale or expand
- Risks and how they will be mitigated
- How performance will be benchmarked and measured
- Implementation strategy and key milestones
- Key assumptions and constraints foundational to the analysis

Any other information you feel is relevant to tell the story of how your product, project, or service will help LA Metro to improve mobility in the Region

**RESPONSE:** ARTT LLC proposes to connect Los Angeles's Union Station to the Dodger Stadium property via the Los Angeles Aerial Rapid Transit system ("ART" or the "Project"). ART is a proven, safe, clean, sustainable, and highly efficient form of transportation that will serve as both a reliable rapid transit system and first/last mile connector, and an iconic new regional tourist destination in and of itself, offering wonderful views of Los Angeles.

ARTT LLC commits to privately fund and obtain financing for the capital construction cost of the proposed Project's direct alternative, as well as privately operate and maintain the ART system. We seek Metro's assistance in three specific areas: potential location of the ART station at Union Station; to act as Lead Agency for environmental clearance; and to potentially assist with matters related to surface land acquisition and aerial easements, as needed. ARTT LLC shall cover the costs associated with the preparation and certification of any required environmental documents including an EIR under CEQA. ARTT LLC shall arrange and pay for all required CEQA studies and reviews at its sole costs and expense.

Although Dodger Stadium is one of the region's most visited venues, the Metro transit system does not include any existing or proposed permanent transit connections. As other venues such as Staples Center and the Los Angeles Memorial Coliseum are now conveniently accessed by transit, and Metro has begun working on a direct connection to LAX, the importance of providing a permanent transit connection to Dodger Stadium has become ever more necessary.

Currently, the Dodger Stadium Express buses provide a connection from Union Station to Dodger Stadium on game days, carrying approximately 1,500 people on average per game, with an average 20-minute travel time to and from the game. While this service is very beneficial and much appreciated, when complete the ART system can carry 5,000 people per hour per direction, and the travel time from Union Station to Dodger Stadium will be about 5 minutes.

Many Dodger fans arrive at Dodger Stadium within two hours prior to the start of a game. At full capacity, 10,000 fans could be transported to the stadium in the two hours prior to a game via the gondola system. The average attendance at a Dodger game is approximately 46,000; accordingly, nearly a quarter of the fans from around the region at a given game could arrive not by car, but by gondola connected to Metro's regional transit system. This would take an average of roughly 3,200 cars off the streets before and after a game.

ARTT LLC and the Los Angeles Dodgers are coordinating to identify available sites at the Dodger Stadium property to locate an ART station. ARTT LLC has also identified potential sites near/adjacent to LAUS, including one site owned by Metro, at which to locate an ART LAUS station. The ART would provide elevated aerial transport either directly (in a straight line), or through two straight lines that connect at an angled station mid-point between LAUS and Dodger Stadium.

ART contributes to Metro's mission of providing transportation services – indeed, economical and environmentally compatible mobility *choices* – and provides an excellent return on taxpayer investment for Metro as there are no Metro funds being requested. Further, ART significantly improves mobility in and around the Dodger Stadium property by providing alternative access to the facility resulting in up to between a 20 to 25% reduction in private automobile trips to and from the stadium on an average game day, thereby reducing existing traffic for the benefit of surrounding communities and neighborhoods.

Further, ART is also consistent with Metro's goals and objectives, including advancing the following Metro Core Business Goals:

- *Promote extraordinary innovation:* The ART system will use state-of-the-art, zero-emission technology, demonstrating the potential of aerial transit in Los Angeles as a key connector to the regional backbone transit system. It will deliver added transit without impacting Metro's capital program and will support Metro's continued nationwide leadership in mobility innovation.
- *Exercise fiscal discipline to ensure financial stability:* ARTT LLC will create the structure for the financing, design, construction, operation, and maintenance of the ART system at no cost to Metro and will obtain necessary financing for the capital construction of the Project.
- *Improve the customer experience and expand access to transportation choices:* Adding to the shuttle bus service currently provided by Metro to Dodger Stadium, this new transportation option will expand access to transportation choices to Dodger Stadium and serve significantly more visitors to the stadium via transit, thus further reducing congestion in the local community and on surrounding regional arterials and freeways.
- *Increase transit use and ridership:* The ART system will substantially boost Metro system ridership by Dodgers fans on game days and could contribute adding other "choice riders" to Metro's system such as tourists. In essence, ART will support Metro's ambition for people to choose transit for mobility. The ease of attending games, events, and recreational activities through ART will encourage thousands of new "choice rider" trips per year and may encourage more regular ridership.

The project assumptions which are most relevant, and which can be validated against existing projects, are related to project costs, projected ridership, and transit service.

The ART, as proposed, is estimated to cost \$125 million for a direct route. Potential project costs have been developed at a number of levels for different project elements and compared to costs of other

aerial transit projects. Costs for the electromechanical equipment and for operations were compared to installations in London, New York City, Portland, Telluride, and Austria. Costs for facilities and tower structures were estimated by local construction professionals. Costs for property and rights-of-way were estimated by real estate and rights-of-way experts.

Ridership projections for the project have been developed with assistance from the Los Angeles Dodgers, transportation professionals, and aerial ropeway engineers. The transit capacity of 3S systems such as that proposed for ART is designed for in excess of 5,000 passengers per hour per direction. This capacity has been verified with providers of such systems. Similar systems operate in Russia and Germany with similar capacities. Gondola systems are proven technologies with many installations worldwide to reference. The major transit systems identified were all referenced for their capacities and system availabilities.

ARTT LLC seeks to build and operate the ART system as quickly as possible. To that end, our goal is to issue the Notice of Preparation for the Draft EIR in the fall of 2018. We assume that it will take approximately twelve months to complete all phases of CEQA, after which we will complete the Final Design of the certified alternative and then proceed through permitting, construction, testing and, operations. We anticipate full operation of the system in late 2022.

As noted above, statutory authority to regulate aerial ropeway systems in California is the purview of the State of California Department of Industrial Relations, Cal/OSHA. ARTT LLC will comply with laws, policies, and procedures set forth by Cal/OSHA. Cal/OSHA employs ANSI B77 standards as a basis of their regulations. The Project will also comply with other applicable codes and regulations in designing and constructing its stations and towers.

Since ART will be privately owned and operated, ARTT LLC will evaluate the success of the system on internal criteria including ridership volume, revenue, sponsorship and advertising, operational performance, and customer satisfaction. If desired, we will work collaboratively with Metro to evaluate overall performance of ART as a privately-operated “first/last mile” extension of Metro’s transit system.

Gondola systems are incredibly safe, resilient and ecologically-friendly. The ART system would be built to the current structural and seismic standards, and its systems have excellent safety records. This system will be delivered with multiple redundant features to ensure the safety of riders, employees, and the general public. Aerial gondola systems are also emission-free, and the ART system would replace a large number of existing car trips that currently occur in congested conditions, helping both Los Angeles and California continue to be global leaders in greenhouse gas emission and associated pollutant reduction. ART ridership would significantly reduce vehicle miles traveled to and from Dodger Stadium, as well as reduce greenhouse gas and associated emissions.

In the last decade, cities worldwide have successfully utilized aerial rapid technology to augment their transit systems or in some cases serve as their transit system. These cities include Portland, OR; London, England; Mexico City, Mexico; La Paz, Bolivia; Medellin, Columbia; Bogota, Venezuela; and Singapore.

## DETAILED PROJECT INFORMATION

### I. Project Description

*Please provide a short, high level description of the project – what it is and what it is intended to accomplish.*

**RESPONSE:** ARTT LLC proposes to connect Los Angeles' Union Station, Southern California's transportation hub, to the Dodger Stadium property via the proposed Los Angeles Aerial Rapid Transit system ("ART" or the "Project"). ART is a proven, safe, clean, sustainable, and highly efficient form of transportation that will serve as both a reliable rapid transit system and an iconic new regional tourist destination in and of itself, offering wonderful views of Los Angeles.

ART will travel a little over one mile in about 5 minutes and can carry roughly 5,000 people per hour per direction. By creating a high-quality and high-capacity transport link between LAUS and Dodger Stadium, ART ensures that there will be more viable choices in making a trip to a Dodger game or special event at the stadium. With Metro's existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, ART provides the opportunity for anyone on the Los Angeles County region to access Dodger Stadium via transit.

ART is an aerial gondola system. Aerial technology – consisting of passenger stations, a ropeway that holds and transports the cabins, and towers to hold the ropeway – has become increasingly popular throughout the world as a high-capacity, high-quality, and economical transit mode. ART will utilize "3S", or triple-rope, technology that enables larger passenger cabins and thus more carrying capacity than other available aerial technology including a single or mono-cable system or an aerial tram.

Although Dodger Stadium is one of the region's most visited venues, the Metro transit system does not include any existing or proposed permanent transit connections. Indeed, regular bus service to Dodger Stadium was discontinued in the early 1990's. As other venues such as Staples Center (Lakers, Clippers, Kings) and the Los Angeles Memorial Coliseum (Rams, USC) are now conveniently accessed by transit, and Metro has begun working on a direct connection to LAX, the importance of providing a permanent transit connection to Dodger Stadium has become ever more necessary.

With the ART system's ability to overcome grade and elevation issues, while providing safe, environmentally-friendly, and high-capacity transit connectivity, it has emerged as the best approach to link the Dodger Stadium site to the region's rapidly growing regional transit system at LAUS. The technology of aerial rapid transit systems has improved to the point that they can carry a capacity equivalent to that of many light rail systems in terms of passengers per hour. The capacity can be quickly increased or decreased to meet demand associated with the intense peaks of activity associated with games and events at Dodger Stadium simply by increasing or decreasing the number of cabins on the ropeway.

Thousands of visitors could reach Dodger Stadium via ART when attending a Dodger game or event at Dodger Stadium. The reduction in thousands of automobiles per game or event will improve the flow of traffic for other vehicles as well as reduce the impacts of congestion on nearby freeways and surrounding areas, thereby improving the game-day transportation experience for neighbors and visitors.

Aerial transit technology is a safe, proven form of rapid transportation. In the United States, Manhattan's Roosevelt Island (42 years) and Portland, Oregon (10 years) provide longstanding urban examples of aerial transit. As world cities seek to combat climate change and congestion with innovative new transit approaches, aerial gondola systems are increasingly popular as effective transportation solutions, including recent examples in London, England; Koblenz, Germany; Mexico City, Mexico; and several South American cities. ART systems can be constructed and deployed more economically and expeditiously than fixed light and heavy rail and reduce air pollution or greenhouse gas emissions.

Indeed, the Project is a game-changer for Metro and the City of Los Angeles. The ART will serve as a new and privately-funded addition to Greater Los Angeles's rapidly expanding transit and mobility-choice network. The proximity of the Dodger Stadium property to Union Station – just over one mile – enables a short and convenient connection to the regional system's transportation hub. The ART system can also become an attraction in and of itself that draws more visitors to take Metro.

## 2. Project Scope and Duration

*Define the project/initiative's scope (e.g., technology, organizations, users, processes, functions, etc.), and any geographic boundaries. Explain what your proposal includes and excludes, and proposed project length.*

**RESPONSE:** The ART system includes stations where the passengers enter and exit the system, cabins in which the passengers ride, towers which hold up the cables, and the cables. ARTT LLC proposes one station located at the Dodger Stadium property and another at or near Union Station. Depending upon the alignment, there could also be an intermediate station. The approximately one-mile ride from Union Station to Dodger Stadium would be short and enjoyable, lasting about five minutes.

The geographic boundaries will be the approximately one-mile between Union Station and Dodger Stadium. The ARTT LLC team has considered a number of possible alignments for the ART system, which we look forward to discussing with Metro and other stakeholders. We anticipate several alternative alignments will be analyzed as part of the Project's environmental review.

The preferred aerial rapid transit technology for the Project is a tri-cable ("3S") detachable gondola system, which is the most advanced technology available and provides the highest transport capacity. Typical 3S cabins comfortably carry between 30 and 40 passengers each, and the system is capable of transporting 5,000 or more passengers per hour per direction.

Currently, many Dodger fans arrive at Dodger Stadium within two hours prior to the start of a game. At full capacity, 10,000 fans could be transported to the stadium in the two hours prior to a game via the gondola system. Since the average attendance at a Dodger game is approximately 46,000, nearly a quarter of the fans at a given game could arrive not by car, but by gondola. This would take approximately 3,200 cars off the streets before and after a game.

Aerial rapid transit systems have been proven as reliable, efficient, and cost-effective rapid transit solutions.

The ART would promote Los Angeles as a leader in high-capacity aerial urban mobility in the United States. The proposed system will use state-of-the-art technology, demonstrating the potential of aerial transit in Los Angeles as a key connector to the regional transit system. The Project could also demonstrate the potential for ART in the region, as other projects of similar scope have been

proposed, including a gondola system that would take tourists to the Hollywood sign. Mayor Garcetti described the ART and the Hollywood project as potential “twin crowns to change the landscape of our City.” Other U.S. cities currently considering the addition of aerial rapid transit systems to expand transit options include Austin, Boston, Miami, New York, Oakland, and Washington D.C.

### 3. Project Timeline

*Please provide a proposed timeline for project design and execution, including all key milestones. Specifically include information about the timing of provision by Metro of any property and/or services.*

**RESPONSE:** ARTT LLC seeks to build and operate the ART system as quickly as possible. To that end, our goal is to issue the Notice of Preparation (“NOP”) for the EIR in the fall of 2018. We assume that it will take twelve months to complete all phases of CEQA, after which we will complete the Final Design of the certified alternative and then proceed through permitting, construction, testing and, finally, operations. We anticipate full operation of the system in late 2022.

ARTT LLC commits to fund and obtain financing for the ART, in order to design, build, operate, and maintain the ART connecting Dodger Stadium to LAUS. ARTT LLC seeks Metro’s assistance in three areas: potential location of the ART station at Union Station; Metro to be Lead Agency for environmental clearance pursuant to the California Environmental Quality Act (“CEQA”); and Metro to assist, as necessary, in the acquisition of surface land and/or aerial easements needed for the ART system. ARTT LLC seeks to fully reimburse Metro for all direct costs of the above, as well as for the costs of the Metro staff time for the above work.

ARTT LLC proposes a services agreement for both the environmental review and for Metro assistance on surface land acquisition and aerial easements, as follows:

- ARTT LLC shall cover the costs associated with the preparation and certification of any required environmental documents including an EIR under CEQA. ARTT LLC shall arrange and pay for all required CEQA studies and reviews at its sole costs and expense. Metro shall exercise its own independent judgment in the review and certification of any environmental documents prepared in connection with Metro’s consideration of the Project; and
- ARTT LLC proposes to partner with Metro in the acquisition of required surface land and aerial easements as needed to construct, operate, and maintain the ART. ARTT LLC will fully reimburse Metro for any costs incurred by Metro in assisting ARTT LLC with land acquisition and/or aerial easements, including all Metro staff time.

We have proposed that Metro act as Lead Agency for CEQA. Our goal is to begin work with Metro immediately to issue the NOP before year’s end, proceed through Scoping, and begin the environmental technical analysis. We will develop a more detailed schedule for the analysis, documentation, and review of each section of the EIR so that Metro staff can anticipate the timing of their involvement.

Concerning property negotiations with Metro for a station location and pedestrian access at Union Station, we anticipate initial negotiations will be part of an Exclusive Negotiation Agreement (“ENA”) between ARTT LLC and Metro; the initial draft of a term sheet for the ENA is included in



this submission. Lease negotiations, if necessary, will follow. We anticipate beginning construction in 2021.

Concerning the timing of Metro's assistance with property acquisition (including the exercise of eminent domain, as necessary), we assume that Metro will not be able to use their eminent domain powers until the final alignment has been selected and the EIR has been certified. We should note here that among the early alignment alternatives under review, we are studying several that almost exclusively operate over public rights-of-way. If an alignment is selected that does operate over private properties, we may request Metro's assistance with property acquisition and, if necessary, the use of eminent domain. We anticipate property acquisition would occur in 2020.

#### 4. Project Requirements

*Describe all requirements for the project as it is described above, including those related to operations, facilities, property, labor, information technology, data access, etc. Please give additional consideration to Material, Technical, and Labor requirements.*

**RESPONSE:** This response further describes the ART system. As noted above, ARTT LLC commits to fund/finance, design, build, operate, maintain, and insure the ART. ARTT LLC will fully comply with all applicable laws, regulations, and rules related to the design, construction and operation of the ART.

The ART system's interface with Metro and its property will be at the station to be located at or near Union Station and pedestrian access to the station.

ARTT LLC proposes a services agreement that would commence with the environmental review and proceed as needed for other Metro assistance, including the potential for help to acquire surface land and aerial easements.

##### **Ropeway Technology | Safety**

Aerial gondola systems are classified based on the number of ropes or cables used in their operation. 3S systems, which ART would use, rely on three steel cables to support and move the cabins. Two stationary cables (track ropes) provide support for the running wheels of the cabins, while the third cable (haul rope) circulates continuously around the system. This tri-cable technology enables 3S systems to provide the highest capacity of any gondola, with larger cabins, longer spans, and greater lateral stability. The haul rope – which is the propulsion rope – is moved by the turning of a large sheave known as a “bull wheel.” The bull wheel is turned by motors located at the station. The ropeway is looped around the bull wheel at each station and the haul rope moves at a steady pace around the bull wheels pulling the cabins in and out of each station.

The proposed ART system will be delivered with multiple redundant features to ensure the safety of riders, employees, and the general public. ARTT LLC anticipates that the cabins will feature a combination of video monitoring and/or audio communications, as well as push-to-talk stations in the cabins. ARTT LLC also anticipates the video monitoring of station activities while attendants are on station platforms.

Aerial gondola systems have alternate power sources to provide backup power in the event of an electrical failure. The most common source of backup power is combustion engines; however, because of technological advances and because of our goals of achieving an energy efficient system,

we are assessing the use of electrical battery storage as emergency power for the ART system. The final size, source and quantity of backup power will be determined in the detailed design phase.

### *Gondola Cabins*

3S cabins typically carry between 30 to 40 passengers each. The cabins allow for sitting or standing, wheelchairs and baby strollers, and can accommodate bicycles. Cabins are fully accessible pursuant to requirements of the American with Disabilities Act (“ADA”). Cabins can be air conditioned and ventilated. The cabins can also include cameras for security to view the inside of every cabin and a communication system so passengers can speak to the operator, similar to Metro’s existing security approach on its rail systems.

The cabins move at approximately 16 to 18 miles per hour. As they enter a station they slow down to allow passengers to enter and exit the moving cabin. This is achieved by detaching the cabins from the haul rope in the station. Once a cabin is detached from the haul rope, the cabin can move at a speed independent of the haul rope, allowing the cabins “on line” (i.e., not in a station) to continue to move at a higher speed. Based on ARTT LLC’s preliminary analysis, cabins will arrive in a station approximately every 25 seconds and once a new load of passengers has boarded, the cabin will re-attach to the cable and advance to the next station.

### *Towers*

The ART system will require approximately four to five towers, which will be built to current seismic and structural standards. The form, location, and height of towers will vary depending on the proposed alignment. Towers would be designed to meet or exceed applicable codes and standards.

The design of the towers can vary widely, as evidenced in the many different approaches to tower design in gondola systems around the world. At most ski resorts, for example, towers are typically utilitarian in design and resemble high-tension power structures. In urban areas, however, towers are often designed more aesthetically and they add a positive visual element in the urban environment. The Project will strive for aesthetic compatibility.



**Images (left to right):** Emirates Air Line tower in London, England; Seilbahn tower in Koblenz, Germany

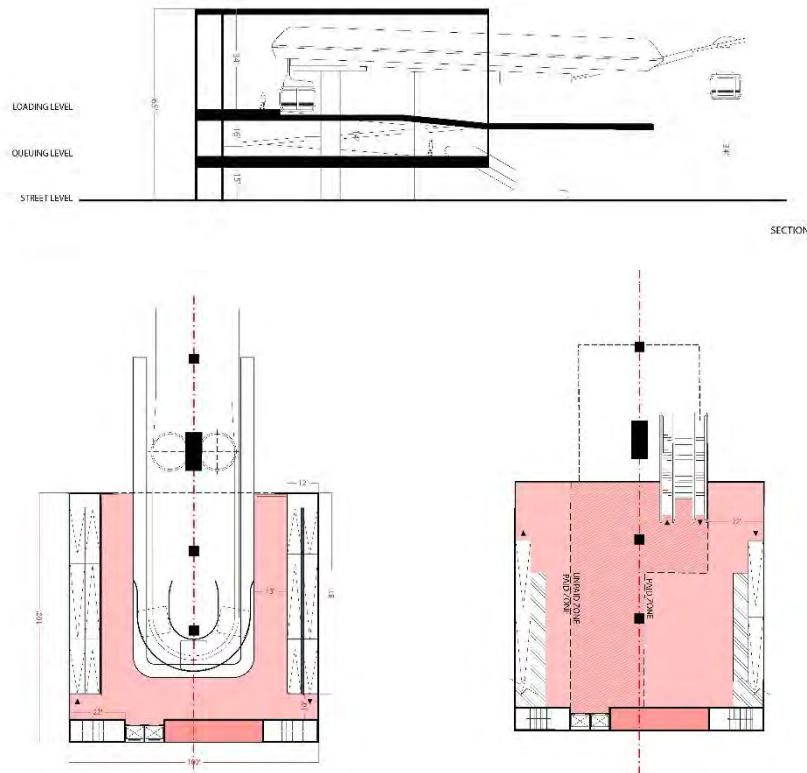
## Stations

Stations include areas for ticketing, queuing, loading and unloading of passengers, operations, and for the system equipment. One station will also include a storage and maintenance area for the cabins as well as staff break rooms, lockers, and parts storage. It is anticipated that the storage and maintenance area will be located at the Dodger Stadium property. Stations will be ADA accessible.

A footprint of 15,000 SF would support the basic elements of a station, including vertical circulation, and provide the length needed for the cabin deceleration and acceleration between transit speed and boarding speed. The station with the storage and maintenance facility will require a footprint of 30,000 square feet. As noted, the ART system intends to locate the storage and maintenance facility at the Dodger Stadium property. See attachments for prototypical station plans and sections.

Within the stations, the loading and departure platform will necessarily be elevated so that the cabins leave the station well above people, cars, trees, and other urban elements in the immediate vicinity of the station. The cabins will continue to climb as they leave the station. The elevated arrival/departure platform also allows for a sufficient length of ramps for queuing. Stations will also include elevators and stairs.

Stations also require access to the mechanical systems for servicing. Once the potential station locations are more firmly identified, specific access provisions will be included in the station design.



**Images (top to bottom):** Section of a prototypical gondola station; Plans of prototypical gondola station [loading level (left), queuing level (right)]

### **Potential Station Locations**

ARTT LLC has identified two potential station locations at or near Union Station.

Metro Potential Development Site C. Metro identified “Development Site C” at the corner of Cesar Chavez and Vignes as a potential development site in the Industry Forum package prepared for the solicitation of a Master Commercial Developer. The site is adjacent to well used bus stops, is across the street from the East Portal entrance to Union Station and Patsaouras Plaza and is within a 5-minute walk (0.25 mile) from the middle of the Union Station pedestrian passageway. This site also presents a great opportunity as a location that is highly visible from Cesar Chavez Avenue.

Alameda Street. ARTT LLC has also identified potential station locations over Alameda Street near Union Station, which in addition to carrying passengers from Union Station, could provide an opportunity to draw visitors to the historic El Pueblo de Los Angeles Historical Monument and provides access to the Civic Center and Downtown.

Should an Alameda Street station be selected as the preferred location for an ART station near Union Station, it is likely that an additional station would need to be located somewhere in the vicinity of Los Angeles State Historic Park in order to accommodate turning movements of the ART into the Dodger Stadium property. Were this to occur, an opportunity to facilitate access to the Los Angeles State Historic Park from the areas west of Broadway Street may be possible. ARTT LLC is willing to work with the public and decision makers who wish to pursue such access.

### **Operation of the ART System**

ARTT LLC proposes to operate the ART system that will connect Los Angeles’s Union Station, Southern California’s transportation hub, to the Dodger Stadium property. ART is a proven, safe, clean, sustainable, and highly efficient form of transportation that will serve as both a reliable rapid transit system and an iconic new regional tourist destination in and of itself, offering wonderful views of Los Angeles.

ART will travel a little over one mile in about 5 minutes and can carry roughly 5,000 people per hour per direction. By creating a high-quality and high-capacity transport link between LAUS and Dodger Stadium, ART ensures that there will be more viable choices in making a trip to a Dodger game or special event at the stadium. With Metro’s existing and planned expansion of its transit system, coupled with other providers such as Metrolink, Amtrak, and other municipal bus operators whose services all converge at LAUS, ART provides the opportunity for anyone on the Los Angeles County region to access Dodger Stadium via transit.

Gondola cabins enter, traverse, and depart stations under fully automated control. Station attendants are within each station to assure safe boarding or to execute stops, if necessary. Attendants also provide customer interaction and observation; if a passenger needs special assistance, an attendant may execute either a slowed or stopped cabin. Typically, a separate operator sits in a booth adjacent to the boarding area and monitors screens, which show activities in each cabin and station as well as all of the system controls. The operator does not typically interact with the passengers.

ART will provide service to all pre-season, regular season and post-season Los Angeles Dodger games and any special events (e.g., concerts) at the Dodger Stadium property. ART may provide service on some or all days of the week to accommodate tourists who wish to visit the Dodger Stadium or simply to ride the ART. Additionally, ART may provide service to adjacent

neighborhoods and/or Elysian Park visitors. Appropriate operational studies and plans will be formulated and discussed as part of the environmental review process.

Since ARTT LLC will operate, maintain, and secure the ART with its own staff, we do not anticipate that Metro will need to add to its staff to support ART. Metro may realize more passengers riding its system, but the addition of choice riders to Metro's excellent services is a positive result and will provide economic benefits to Metro and environmental benefits to our region.

ARTT LLC assumes that the ART will operate in concert with other mobility choices available to access the Dodger Stadium property, including Metro's Dodger Stadium Express. Should Metro wish to re-evaluate continuation of the Dodger Stadium Express, ARTT LLC assumes that Metro will consult and reach agreement with the Los Angeles Dodgers and other stakeholders on the future of this service.

As noted above, forms of payment technology and fare options are being explored by ARTT LLC. We look forward to discussing these issues further with Metro.

### **Maintenance**

ARTT LLC will maintain the ART system. The detailed maintenance plan will be developed in conjunction with the system design.

**a. Materiel Requirements**

*Include requirements for physical materials or assets to be supplied by Metro, including property, facilities, rolling stock, vehicles, supplies, or other assets.*

**RESPONSE:** As detailed above, as to property and facilities, ARTT LLC has identified two potential station locations at or near Union Station: Metro's identified "Development Site C" and over Alameda Street near Union Station. If Development Site C is selected, ARTT LLC would seek a ground lease with Metro for the ART. For any station location at or near Union Station, ARTT LLC would coordinate with Metro concerning pedestrian access to the station.

**b. Technical, Interface, and Data Requirements**

*Include requirements technical capabilities or capacity to be provided by Metro, including any required IT infrastructure, hardware, software, systems, interface, or storage requirements, as well as any data exchange requirements or protocols to the level of detail needed to assess capacity, labor, and cost. A summary table may be appropriate.*

**RESPONSE:** At this time, ARTT LLC does not anticipate having any technical, interface, or data requirements from Metro. See Part II, 5 regarding data collection, reporting, and sharing for additional information.

**c. Labor, Contractor Support, and Other HR Requirements**

*Include requirements for human resources including labor (specify specific trade or union if applicable, as well as non-covered employees), all proposed contractor support, and management/senior leadership.*

## RESPONSE:

### Requirements from Metro

ARTT LLC commits to privately fund and obtain financing for 100% of the design, capital construction, operation, and maintenance costs of the direct route for the proposed Project. No funds are being sought from Metro. We seek Metro's assistance in three areas: location of the ART station at or near Union Station; to act as Lead Agency for environmental clearance; and to assist with matters related to surface land and aerial easements acquisition, as needed. The Project seeks to fully reimburse Metro for these items, as well as the costs of the Metro staff time for the above work.

ARTT LLC is aware of the many projects and programs that Metro has committed to deliver to Los Angeles County residents, and we know that adding another endeavor will require additional resources from Metro. Accordingly, ARTT LLC's Project team seeks to provide as much efficiency as possible to Metro staff while assuring the resources are available for their independent review to ensure the best possible solutions for Metro approval. Consistent with Metro's goals for its Office of Extraordinary Innovation, we look forward to working together so this investment is an innovative, sustainable, zero-emission rapid transit solution to Dodger Stadium, that will also support the improvement of mobility throughout the region.

We provide the following, additional detail about ARTT LLC's requests of Metro:

- Location of the ART station at or near Union Station. An ART station at or near Union Station would provide seamless connections for passengers transferring from regional rail, bus, or local transit. In the event that the station is adjacent to Union Station, but not on Metro property, we will work with Metro to ensure access for ART passengers through Union Station in a safe and appropriate fashion. The Project team will work with Metro staff to assess the previously noted sites and to take into account any of Metro's long-range plans for the Union Station property.
- Lead Agency for environmental review pursuant to CEQA process. ARTT LLC proposes to contract with and fund preparation of the required CEQA documentation for the Project. To the extent feasible for the ART, ARTT LLC will utilize Metro's "on call" list of approved consultants for preparation of the technical analysis and environmental review. We will initially develop a schedule of deliverables jointly with Metro and ensure that qualified consultants provide all necessary technical analysis and environmental documents to the appointed Metro staff for their review. ARTT LLC shall cover the costs associated with the preparation and certification of any required environmental documents including an EIR under CEQA. ARTT

LLC shall arrange and pay for all required CEQA studies and reviews at its sole costs and expense. Metro shall exercise its own independent judgment in the review and certification of any environmental documents prepared in connection with Metro's consideration of the Project. Additionally, ARTT LLC is fully committed to full and open community engagement and collaboration and will be retaining community outreach experts to work with our team and Metro during the environmental review, design, and construction processes.

- Assistance with acquisition of surface land and aerial easements, as necessary. ARTT LLC is committed to paying fair market value for private surface land and aerial easements required to deliver the Project. ARTT LLC anticipates entering into a services agreement with Metro for Metro personnel working with ARTT LLC in the acquisition of surface land and/or aerial easements. ARTT LLC shall fully fund Metro staff time and all direct expenses related to these activities.

## 5. Data Collection, Reporting, and Sharing

*Please describe what data and information will be collected including type, scope, and format, how such data and information will be collected and reported to project partners, and what limitations, if any, would be imposed on the use, discussion, reporting, or sharing of this data and information,*

**RESPONSE:** ARTT LLC anticipates it may collect data from the ART customer base as part of customer surveys or interviews. Information to be collected could include how the passenger arrived at the ART (e.g., bus, train, car, ride-share, bike, or walk); if by car, where did they park; where the passenger came from; why they chose the ART to access a game/event at Dodger Stadium; how often the passenger rides the gondola (one time only, every Dodger game, etc.); and what improvements they would like to see, if any. We also anticipate collecting data on the volume of ridership so that we can calibrate the flow of the cabins. We would be willing to meet regularly with Metro to discuss this data to assist Metro in managing crowd flow through and around Union Station. Certain data, consistent with current practice, may be proprietary to ARTT LLC and/or the Los Angeles Dodgers and would not be for public release.

## 6. Outline of Potential Terms and Conditions

*Please describe any essential terms and conditions that could be part of a subsequent agreement with Metro.*

**RESPONSE:** ARTT LLC is pleased to provide Metro with the enclosed draft term sheet for an Exclusive Negotiation Agreement (ENA) that sets forth the terms and conditions for a services agreement with Metro that would commence with CEQA, as well as for a possible lease of property at Union Station for an ART station, and then continue as appropriate for surface land and aerial easement acquisition. As noted above, we are requesting a sole source determination.

## 7. Disadvantaged/Small Business Enterprise Participation

*Please describe a goal for participation of disadvantaged/small business enterprises (DBE/SBE), as well as expected strategies to achieve that goal.*

**RESPONSE:** ARTT LLC has a goal of including DBE/SBE contractors, to the extent feasible, in the design, construction, operation, and maintenance of the ART at no cost to Metro.

## 8. Labor Requirements

*If the project includes occupations covered by Federal, State, or Municipal/Local wage laws, please describe and indicate how compliance will be documented and certified.*

**RESPONSE:** ARTT LLC will have a Project Labor Agreement (PLA) for the Project, consistent with Metro policies, that governs labor requirements for the Project.

## 9. Points of Contact: Roles and Responsibilities

*Please include information about the individuals who will be responsible for delivering the project, including contact information and key responsibilities for:*

- *the lead point of contact for project implementation;*
- *any functional and technical experts that will be involved and may need to be contacted by Metro staff; and*
- *any technical support or service personnel that may need to be contacted by Metro staff.*

**RESPONSE:** ARTT LLC is dedicated to delivering this Project and has all support and resources necessary for successful project implementation, including an assured ridership base through partnership with the Los Angeles Dodgers and strong support to date from the City of Los Angeles and other stakeholders. Representatives met in Europe this summer with both senior executives and technical staff of the two major manufacturers of gondola systems in the world, which both have US companies as well: Doppelmayr USA, Inc. and Leitner-Poma of America, Inc. At these meetings, we presented the program and reviewed route alternatives; these meetings generated significant enthusiasm and interest from manufacturers for participation while reconfirming the feasibility and ridership benefits of the proposed Project. In addition, team representatives recently toured the successful projects in London, Koblenz (Germany), and Portland, Oregon to refine concept planning with real-life examples of visitor interface, integration into the urban fabric (London and Portland) and access coordination with other transportation modes such as bicycles, automobiles, light rail, and other transit connections. In addition to support of ownership and the Los Angeles Dodgers, the Project continues to be supported by a team of highly-qualified consultants with the expertise necessary to implement the Project. Following submittal of the initial proposal in April, the expert team has continued to advance project design together with key issues such as environmental and air quality analysis, route alternatives and community outreach.

The lead point of contact for the team is as follows:

The Project Director of Aerial Rapid Transit Technologies LLC (ARTT) is **Martha Welborne**, the former Chief Planning Officer of Metro, who led Metro's long-range transportation program in Los Angeles County, and initiated the design and delivery of 12 new transit corridors approved by County voters. She has a track record of delivering ambitious, public-serving projects, including as Managing Director of the Grand Avenue Committee, and in her work to initiate what became Metro's rapid bus transit system.



Martha Welborne, Project Director  
700 South Flower Street, Suite 2995  
Los Angeles, CA 90017  
[martha.welborne@aerialrapidtransit.la](mailto:martha.welborne@aerialrapidtransit.la)

As stated in the initial proposal, the other lead consultants include, in a Project Steering Committee, the following:

**Engineering Specialties Group** provides engineering and consulting services for the transportation and ropeway transit industries. ESG professionals have provided these services for countless clients and installations across the resort and urban environments for over 40 years, including for the recently-completed gondola component of the Transbay project in San Francisco and many others. Staff remain on the forefront of the adoption of ropeways into the urban environment and sit on the national standards committee for passenger ropeways (ANSI B77).

Mike Deiparine, Senior Consultant  
8730 Tallon Lane, Suite 200  
Lacey, WA 98516  
[mike.deiparine@scjalliance.com](mailto:mike.deiparine@scjalliance.com)

**pointC, LLC** — and its predecessor entity Planning Company Associates — has provided strategic mobility services to both public and private clients for the past 32 years. Led by David Grannis & Tony Harris, pointC specializes in innovative mobility strategies, transportation funding and economical and efficient project delivery. pointC has been involved in numerous mobility/transportation projects of regional significance; examples include the funding/financing of the Alameda Corridor, the structure and delivery of the Los Angeles to Pasadena Gold Line, funding for the coastal portion of the Hearst Ranch Conservation agreement, and strategic advisory services to Metro as part of the Union Station Master Plan.

David Grannis, Partner  
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**Latham & Watkins LLP** is a global law firm founded in Los Angeles over 70 years ago with extensive experience handling complex land use and infrastructure matters, including transportation projects. Latham lawyers have extensive familiarity with Metro, having assisted with the City approvals for the Union Station development agreement, Union Station headquarters and MWD headquarters, as well as representation of many other property owners in successful partnerships with Metro, the City, and other public and private stakeholders.

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Other functional and technical experts that will be involved and may be contacted by Metro staff include:

**HR&A Advisors, Inc.**, is a real estate and economic development consulting firm providing strategic advisory services to transit agencies related to business planning, economics, public-private partnerships, and transit-oriented development. HR&A has worked with Metro on a number of transformative projects. HR&A also has experience developing implementation strategies for other aerial transit systems in the United States, notably the New York City Sky Line, a proposal to bring a gondola system from Lower Manhattan to Governor's Island and Red Hook in Brooklyn.

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99 Hudson Street, 3<sup>rd</sup> Floor  
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**Johnson Fain** has established itself as an architecture, planning and interior design firm known for its creative approach to the built environment over the past 28 years of professional experience in the United States and overseas. Johnson Fain has completed over forty transit related and transit-oriented community projects. All have been extremely successful and have added important elements and improvements to mobility and the urban fabric. A few of these projects include the LA Metro System-wide Station Design, the Culver City TOD Visioning Study, the Fullerton Transportation Center and Blossom Plaza at the Chinatown Gold Line Station.

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**Ramboll** is a leading international engineering, design, and management consultancy. Headquartered in Copenhagen and privately owned, Ramboll has more than 13,000 employees across 300 offices in 35 countries. The Ramboll Environment and Health (REH) group has a network of more than 2,100 environment, health, and water employees globally. REH is among the world's leading environmental and health consultancies, trusted by clients to understand and manage the impacts of their activities and products so that they can respond to business, regulatory, or legal challenges effectively and develop sound strategies for operating sustainably.

Eric C. Lu, Principal  
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**Fehr & Peers** has specialized in providing transportation planning and engineering services to public and private sector clients since 1985. The firm develops creative, cost-effective, and results-oriented solutions to planning and design problems associated with all modes of transportation. Fehr & Peers takes a creative, data-driven approach to each of its practice areas: travel behavior and forecasting, multimodal operations and simulation, transit planning, bicycle and pedestrian planning, sustainable transportation, freight systems and airports, integrated land use and transportation plans, conceptual street and trail design, and transportation engineering and ITS design.

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**Nabih Youssef & Associates, Structural Engineers (NYA)** is an internationally recognized structural engineering firm providing specialized structural and earthquake engineering consulting for new and existing buildings. Established in 1989, the firm's design practice is geared towards architecturally complex building projects, including educational, residential/housing, restaurants, commercial, and public projects. NYA currently has over 40 practicing engineers and is based in Los Angeles with additional offices located in San Francisco and Irvine.

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**Ek, Sunkin & Bai** Ek, is a full-service public affairs, strategic communications and government advocacy firm. The firm has successfully represented corporations, trade associations, non-profits and public agencies at the local, state, regional and federal levels including transportation-related matters. Ek, Sunkin & Bai has been retained to assist ARTT with services including stakeholder communication and community outreach.

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## 10. Risk Summary

*Please provide a summary of key risks (business, legal, financial, technical, etc.), including any risks associated with assumptions, and how they will be mitigated, managed, or shared between partners.*

### **RESPONSE:**

General. A key risk to both public confidence and financial confidence in this Project relates to the ability to timely deliver the Project. Since the Project was submitted in April 2018, we are eager to proceed to understand the assistance Metro is willing to provide to ARTT LLC for the Project. The ART offers significant regional and local benefits.

Technical. ARTT LLC has reviewed a number of potential station locations and the resulting alignments for technical feasibility. ARTT LLC has proposed, in part, to partner with Metro to assist, as may be necessary, in the acquisition of needed surface land for stations and towers and/or aerial easements.

Financial. ARTT LLC will fund/finance, design, build, operate, and maintain the ART system. ARTT LLC has made preliminary assessments of the total Project costs and intends to periodically review the cost projections and to monitor the cost implications of major decisions to manage Project costs.

## II. Price/Cost Information, Revenue Impacts, and Cost-Sharing

*Proposed price or total estimated cost for the effort and/or the revenue generated in sufficient detail for meaningful evaluation and cost analysis, including an annual cash flow for the project and annual or future costs to operate and maintain. If any cost-or risk-sharing, or other innovative payment or pricing schemes are to be included, please explain them here.*

**RESPONSE:** The estimated costs for ART are \$125 million. ARTT LLC has proposed that the ART would be funded/financed, designed, built, operated, and maintained by ARTT LLC at no cost to Metro. This commitment is based on the direct route with two stations. ARTT LLC would be happy to coordinate any potential additional points of access (e.g., a station near Los Angeles Historic State Park) if other sources of non-Metro funding are available. ARTT LLC is deeply committed to this innovative project and fully capable of meeting all funding commitments.

As noted, ARTT LLC will operate the system privately and retain all revenue from the system operations. ARTT LLC acknowledges that it will reimburse Metro for its direct costs related to its work as Lead Agency for CEQA and any assistance provided for property acquisition and/or air rights easements. Depending on the ultimate site chosen for the station at Union Station, ARTT LLC may provide lease payments to Metro as part of a long-term lease agreement.

More detailed notes on assumed costs and revenues are provided below.

### **Capital Costs**

A direct route from Union Station to Dodger Stadium is anticipated to cost approximately \$125 million, as shown on the attached cost summary. Following completion of environmental review and permitting, ARTT LLC will secure third party financing for the full capital construction cost of the Project. Cost estimates were based on a direct alignment from Union Station to the Dodger Stadium property, a linear distance of approximately 1.2 miles. All cost estimates were developed by professionals based on estimates of quantities of materials necessary to construct land-affixed system components such as towers and stations and manufacture other system parts (e.g., tons of concrete/steel or linear length of the aerial system). Since the Project is currently in the conceptual design phase, this is an early estimate, which will be updated as design progresses.

Components of the mechanical system for the Project's 3S aerial transit system are highly custom and will be manufactured by the manufacturers of such systems outside of the Los Angeles region and installed by local contractors. Cost estimates for these components, which include ropeway, cabins, and the full mechanical system, were estimated based on costs for comparable, recently completed 3S systems in Europe. The 1.2-mile length of the system dictates the amount of ropeway and the maximum number of cabins. Estimates based on these systems were also adjusted for currency and economic inflation.

Cost estimates for stations were based on prototypical station designs developed by the technical team based on space requirements for aerial system components, required station height to accommodate gondola aerial clearance, structural loading, cabin storage, and other ancillary uses such as passenger queueing and ticketing.

Individual tower costs were estimated based on the quantities of materials required to construct towers to the necessary heights for gondola clearance. ART will meet and/or exceed all Code requirements applicable to the Project.

All labor cost estimates assumed fair market labor rates in the local Los Angeles market for construction.

Given expected construction cost growth in the near term, a 15 percent contingency was assumed. These costs have been validated against other system costs internationally and have been checked against similar recent proposals for domestic systems such as in Austin, Boston, New York, and Washington, DC.

### **Operating Costs**

Operational cost assumptions have not yet been developed for ART; however, based on performance of existing systems and estimates of future ridership and ART hours of operation, operating cost components include:

- **Labor:** Labor costs to operate the ART system are variable based on the number of operational days per year, the daily hours of operation, and the ridership. System staffing requirements include a general manager, other management staff, mechanics, operators, and attendants.
- **Energy:** Energy costs are estimated based on an assumption of the operation of an 800-horsepower motor during system operations.
- **Marketing:** ARTT LLC intends to market the ART system to encourage ridership.
- **Capital replacement reserve:** ART system revenues will contribute to an annual capital replacement reserve for the replacement of system components at varying intervals of time.

### **Anticipated Revenues**

ARTT LLC will generate revenue through passenger fares, advertising, and system sponsorship. While we have not yet established what the range of fares will be, categories of revenue anticipated by ARTT LLC, which were evaluated by the Project team to develop and validate a viable operating model, include:

*Passenger Fares – Dodger Stadium Event Attendees:* ARTT LLC envisions that a round trip ride on ART will cost less than the average parking costs at the stadium.

*Passenger Fares – Tourists:* During non-event times, tourists may be able to ride the ART system to take in scenic views of greater Los Angeles and to visit historic Dodger Stadium.

*Passenger Fares – Commuters and Park Visitors:* ART may facilitate daily commuter and other trips for residents and workers in northern Chinatown, Solano Canyon and at Dodger Stadium, with direct access to and from Union Station, as well as visitors to Elysian Park.

*Advertising:* In-cabin, on-cabin, and in-station advertising opportunities are a part of ARTT LLC's business model and may or may not be packaged with an overall system sponsorship agreement.

*Sponsorship:* With visibility from both the ground and as viewed by riders, the ART system provides a significant and valuable opportunity to potential sponsors and advertisers. Such a sponsorship is often packaged with advertising opportunities and can provide substantial upfront and operating capital to subsidize system operations.

Corporate sponsorships and advertising revenue can support annual operations and reduce the direct cost to passengers.

## **I2. Additional Information**

*Identify any other relevant project information.*

**RESPONSE:** N/A

## **PART III. BENEFITS AND PERFORMANCE**

### **I. Summary of Expected Benefits**

*Describe the desired/expected outcomes, positive results, benefits, efficiencies, and/or cost savings of implementing this project/program (in measurable terms if possible).*

**RESPONSE:** ARTT LLC anticipates that the implementation of ART will:

- Provide the funding/financing, design, construction, operation, and maintenance of the Project at no cost to Metro.
- Provide people attending Dodger games and events at the stadium with more opportunity to utilize Metro's transportation system via the region's transport hub at Los Angeles Union Station, specifically due to the capacity, speed, comfort and quality experience that ART will provide.
- Provide enhanced economic value to people attending games or events at Dodger Stadium due to the reduced cost of combining a Metro ride and an ART ride versus driving and parking at an event.
- Significantly increase the number of people entering and exiting Dodger Stadium via transit – up to 20 to 25% of overall attendance –due to ART's capacity to carry in excess of 5,000 people per hour per direction.
- Significantly reduce the number of cars entering and exiting Dodger Stadium – and congesting the routes through and adjacent to communities and neighborhoods. ARTT LLC anticipates between a 20 - 25% decrease in private automobiles at Dodger Stadium due to ART.
- Improved air quality in surrounding communities, which are neighborhoods already environmentally impacted as detailed in the metrics of CalEnviroScreen 3.0 (Office of Environmental Health Hazard Assessment). These neighborhoods are in close proximity to major freeways, the SR-110 and the US-101, as well as heavily congested arterials (Sunset Boulevard) that create both safety and air quality issues.
- Reduced congestion in and around Dodger Stadium, its adjacent neighborhoods and communities, and along major arterial and freeway routes, thereby reducing air quality impacts and greenhouse gas emissions.
- Enhanced safety within adjacent neighborhoods and communities due to a reduction in vehicles in the area.

ART will provide a range of benefits, including mobility and accessibility, air quality, economic and fiscal, and benefits to the surrounding communities. Each of these categories is described below.

#### **Mobility and Accessibility Benefits**

With the ART system based at the hub of the region's transportation system, transit riders from all over Southern California can have single transfer access to Dodger games and

other events at the stadium, via regional and commuter rail, light rail, bus, shuttle and pedestrian connections at Union Station. ART's unique design provides consistent capacity during peak periods, is reliable, and is ADA compliant and accessible. ART ridership would reduce the potential for transportation congestion and longer trips. ART will also provide riders with an enjoyable ride to their event.

As the ART system has a capacity of at least 5,000 people per hour per direction, at full capacity a minimum of 10,000 people could take the gondola to Dodger Stadium in the two hours prior to a game, which is currently when most Dodger fans arrive. Since the average attendance at a game is 46,000, the gondola could carry more than 20 percent of the fans to the stadium. That is roughly 3,200 cars that will not drive to the stadium and park, thus bringing a notable relief in congestion surrounding the stadium both before and after the games or events.

### **Air Quality and GHG Benefits**

ART is an eco-friendly transit option. ART will help the region maintain and achieve attainment of Federal and State air quality regulation standards. Regional air quality is governed by National Ambient Air Quality Standards (NAAQs) and California Ambient Air Quality Standards (CAAQs), both of which regulate pollutants considered harmful to public health and the environment [including for SO<sub>2</sub>, CO, NO<sub>2</sub>, O<sub>3</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and Lead (Pb)]. The State of California CAAQs as additional standards, which are generally more restrictive than NAAQS.

ART will also contribute to regional and local efforts to better-integrate environmentally-conscious land use and transportation planning in order to reduce GHG emissions. California's Sustainable Communities and Climate Protection Act (SB 375) requires that all regional planning organizations include a Metropolitan Planning Organizations component in Regional Transportation Plans (TFP). The Sustainable Communities Strategy must achieve GHG emission reduction targets through the development of more compact, complete, and efficient communities.

The Project will contribute to SCAG's goals to reduce per capita transportation emissions by 8 percent by 2020, 18 percent by 2035, and by 21 percent by 2040 (all of which exceed the mandated reduction standards).

### **Economic and Fiscal Benefits**

The proposed \$125 million ART system will deliver economic benefits to the Los Angeles region both during construction and during operations. During construction, the Project will produce both direct and indirect jobs. "Direct" impacts include on-site construction jobs; "indirect" impacts are those resulting from construction contractor purchase of goods and services to support the Project. Most of the jobs created to build the Project will occur in the City and County of Los Angeles, with the exception of the gondola mechanism itself, which will be manufactured by the system manufacturer outside the Los Angeles region and then installed in Los Angeles.

The ART system will also produce long-term benefits to the regional economy through its on-going operation. This includes onsite employment of the operations and management team, as well as spin-off benefits of new economic activity likely to be located near the station areas and an increase in tourist activity.



## Community Benefits

ARTT LLC is committed to a project that benefits the neighbors of Dodger Stadium and Dodger fans across greater Los Angeles. The Project would be a pleasing addition to the community, with stations and aerial gondolas designed for aesthetic compatibility. Residents in neighboring areas (including Echo Park, Solano, Chinatown and Northeast Los Angeles) would benefit from a reduction in traffic congestion, air emissions, noise, and pollution. Both the reduction in the number of vehicles driving to the Dodger Stadium property and a reduction in the idling time of vehicles spent in local neighborhood areas will lead to a reduction in total air emissions.

Additionally, the Project could support expanded utilization of Elysian Park. The Los Angeles Dodgers have committed to working closely with the Project as transportation for Dodgers fans to games at Dodger Stadium and other events and venues. The Project will undergo a robust CEQA process and engage the community to ensure that it achieves shared objectives.

The ART system is well-aligned with Metro's objectives to provide more mobility choices for Los Angeles County residents. Metro is leading the transformation of Southern California from a car-dominated society toward a dynamic, sustainable transit-oriented region. As the Metro system continues to grow with the many transit projects included in Measures R and M, Union Station will be even more convenient for Dodger fans to visit the Stadium via rapid transit and the ART system, supporting increased growth for Metro's overall system ridership into the future. As an enjoyable experience for visitors, the ART system can also draw new tourists to and through Union Station, demonstrating the region's commitment to equitable transportation investment to the world.

The ease of attending games, events, and recreation through ART will encourage new "choice rider" trips and can catalyze more regular ridership. In addition to Union Station's linkages to 141 miles of subway, light rail and bus rapid transit, it is the hub of Metrolink's commuter train lines; all of these systems are used by Dodger fans. When ART is added to Metro's other system expansions, we anticipate increased transit utilization to Dodger Stadium, with more fans arriving at Union Station by transit and then connecting to the Stadium via the ART system. Many Dodger fans will learn more about Metro and could become regular riders, which would increase the likelihood they will use the Metro system for other trips.

## 2. Performance Assessment

*Please describe how these performance indicators and/or measures will be measured and assessed, including any quantitative measurement, sampling, interpolation/extrapolation, modeling, etc. as well as qualitative assessment.*

**RESPONSE:** Since ART will be privately owned and operated, ARTT LLC will evaluate the success of the system on internal criteria. These measures are likely to include ridership volume, revenue production, success with sponsorship and advertising, operational performance, and customer satisfaction.

### 3. Final Evaluation and Conclusions

*Please describe how the overall performance of the project or program will be evaluated, whether any conclusions or recommendation or further action/next steps will be generated, and if so, how.*

**RESPONSE:** The overall performance of the ART system will be evaluated annually, and improvements made as needed. Our goal is for the system to operate for the full useful life of the mechanical system and it will be replaced with a comparable system of the latest state of art at that time.

## **PART IV. SUPPORTING INFORMATION**

*To Be Completed by Applicant. Please identify the following.*

### **I. Contract Type**

*Type of contract or negotiated agreement being sought (the final determination on type of contract shall be made by Metro, should Metro decide to proceed with a contract).*

**RESPONSE:** Please see the enclosed draft term sheet for an Exclusive Negotiation Agreement (ENA) for a services agreement that would be the contractual vehicle to address Metro role as the Lead Agency on the environmental review pursuant to CEQA and any assistance in the acquisition of surface land and/or aerial easements for the construction and operation of the ART. The ENA would also set forth the parameters for a potential ground lease by and between Metro and ARTT LLC should the siting of an ART station be located on Metro-owned property at or near Union Station.

### **2. Organizational Information and Qualifications**

*Include a description of your organization, previous experience in the field, and facilities to be used.*

**RESPONSE:** See response to Part II, 9. ARTT LLC's team includes highly qualified experts that is committed to deliver the Project on an ambitious schedule. ARTT LLC plans to obtain third party private financing for the capital construction of the Project, as well as to privately operate and maintain the ART system. The Proposer is deeply committed to this innovative project and fully capable of meeting all funding commitments.

### **3. Conflicts of Interest and Environmental Impacts**

*Please include or attach all required statements and disclosures, if applicable, about organizational conflicts of interest and environmental impacts.*

**RESPONSE:**

ARTT LLC Conflicts of Interest: ARTT LLC has not identified any organizational conflicts of interest.

Environmental Impacts: ARTT LLC anticipates that the operation of the ART will provide an overall net environmental benefit to the areas surrounding Dodger Stadium with regard to traffic, air quality, safety, and greenhouse gas emissions. The potential environmental impacts (and benefits) of the Project will be analyzed as part of the environmental review under CEQA.

### **4. Financial Resources**

*Information, in the form of Metro's Pre-Qualification Application (see Exhibits D & E of the Unsolicited Proposal Policy) demonstrating to Metro that the proposer has the necessary financial resources to complete the project, as determined by Metro and OEI staff. Such information may include (i) financial statements, including an Auditor's Report Letter or an Accountant's Review Letter, Balance Sheets, Statements of Income and Stockholder's Equity, and a Statement of Change in Financial Position; (ii) un-audited balance sheets; (iii) names of banks or other financial institutions with which the proposer conducts business; and (iv) letter of credit commitments.*

**RESPONSE:** We note that Metro’s Pre-Qualification Requirements are identified in the context of projects to be issued for public bids, while ART LLC has requested Metro to consider its request for a sole source determination. As described above, since no public funds are requested from Metro, and full reimbursement of services is proposed through a services agreement, we seek to proceed to an ENA as quickly as possible.

ARTT LLC has access to the necessary resources to fund and finance this Project including for the initial phases, such as the required next step of environmental review. Upon CEQA clearance and permitting progress, ARTT will also be able to proceed to additional investor engagement. Interest in the Project has been very strong, and demonstrated progress with Metro toward implementation is an important next step. As the Project advances through the approval process, ARTT LLC looks forward to discussing with Metro the additional evidence appropriate to demonstrate ARTT LLC’s financial resources in connection with the Project.

# ATTACHMENTS

## METRO'S ATTACHMENT B: APPLICABLE POLICIES AND LAWS WORKSHEET

This worksheet is not intended to be exhaustive, but to better understand which policies, laws and requirements the proposer plans to meet, and which the proposer believes do not apply or would not be overly burdensome/costly to meet.

Policy	Applicable?	Rationale
American with Disabilities Act (ADA)	Yes	--
Metro Adjacent Development Handbook & Adjacent Construction Design Manual	Yes	--
Metro Green Construction Policy	Yes	--
Construction Careers Policy	Yes	--
Project Labor Agreement (PLA)	Yes	--
American National Standards Institute (ANSI) B77.1-2017	Yes	This latest 2017 revision is not currently codified in California, rather an older version is the basis for California's passenger ropeway codes. ARTT LLC will work closely with Cal/OSHA's Amusement Ride and Tramway Unit regarding codes and standards compliance.
Metro Equity Platform Framework	Yes	--
LAUS Agreements (CC&Rs)	Yes	--
Crossing of State Route 110 (SR-110)	Yes	--
National Fire Protection Association (NFPA) 130 Standard for Fixed Guideway Transit and Passenger Rail Systems	N/A	Not applicable to ropeways; it is intended primarily for fixed guideway and rail systems.
NFPA 101 Life Safety Code	Partial	Intended for buildings; as applicable, could be applicable to stations.
NFPA 70 National Electric Code	Yes	ANSI B77.1 (2.2.1.1.) specifically requires that electrical systems of passenger ropeways comply with ANSI/NFPA 70-2017 (and IEEE C2-2017 National Electrical Safety Code).
NFPA 72 National Fire Alarm Code	Partial	As applicable, could be applicable to stations.
Los Angeles Fire Department (LAFD) Chief's Regulation #4 Standards	Yes	We understand this to be a regulation for the testing and repair of fire protection equipment. As applicable, the station would comply. We would not expect it to be strictly applicable to cabins, although the fire/life safety devices located in cabins may be tested and repaired in accordance therewith.
Long Beach Fire Department (LBFD) Fire Protection and Life Safety Certification Program	No	We understand this to be a program modeled after Chief's Regulation #4 (above), as modified by the Long Beach Fire Department, and therefore not applicable.
Metro Fire/Life Safety Design Criteria	No	This document contains specific requirements for fire protection on fixed guideway transit systems. Transportation systems not included in the definition of fixed guideway transit systems are specifically excluded from its scope (1.1.2 C).

# ART Capitalized Project Cost Estimate

<b>Aerial System Procurement &amp; Installation</b>		
Mechanical System, Including Ropeway and Cabins <sup>1</sup>		\$30,000,000
Urban Installation Premium (5%) <sup>2</sup>		1,500,000
<b>Aerial System Procurement &amp; Installation Subtotal</b>		<b>\$31,500,000</b>
<b>Stations &amp; Towers Construction</b>		
Dodger Stadium Property Station		\$10,500,000
Union Station		10,500,000
Stations Design Premium (30%) <sup>3</sup>		6,500,000
<b>Station Subtotal</b>		<b>\$27,500,000</b>
Towers (Total Cost) <sup>4</sup>		\$7,500,000
Towers Design Premium (50%) <sup>5</sup>		4,000,000
<b>Tower Subtotal</b>		<b>\$11,500,000</b>
<b>Project Labor Agreement (10% of Station/Towers/Sys. Inv.)</b>		<b>4,000,000</b>
<b>Stations &amp; Towers Construction Subtotal</b>		<b>\$48,000,000</b>
<b>Acquisition Costs</b>		
Dodger Stadium Property/Land Cost	TBD	
Union Station Ground Leases (Capitalized)	TBD	
Tower Land Costs <sup>6</sup>		1,750,000
Aerial Easements and Other Land Costs <sup>7</sup>		11,975,000
<b>Acquisition Costs Subtotal</b>		<b>\$18,725,000</b>
<b>Soft Costs</b>		
Project Administration		\$3,700,000
Legal		7,000,000
Public Relations		1,750,000
Metro Unincluded Proposal Process (through MCD)		1,280,000
Advance Engineering (10% Engineering)		600,000
CEQA Clearance		3,270,000
Work to System Bid Documents (30% Engineering)		2,400,000
Procurement		430,000
ROW & Aerial Easement Acquisition Fees		800,000
Permits & Entitlements		900,000
Community Benefits & Other Costs		5,000,000
<b>Soft Costs Subtotal</b>		<b>\$27,155,000</b>
<b>Other Costs</b>		
Contingency / Escalation (15% of Tot. Costs excl. Soft Costs)		\$13,000,000
CR Site Improvements	TBD	
<b>Other Costs Subtotal</b>		<b>\$13,000,000</b>
<b>Preliminary Conceptual Cost Estimate</b>		
		<b>\$128,380,000</b>

## FOOTNOTES

- Based on comparable recent systems, including Penkenbalm and Eisgrubalm in Austria. Adjusted for currency and economic inflation. Estimated costs include the design, purchase and installation of the aerial system.
- Premium TBD. Currently, Marshall & Swift cost estimator (2018). Cost premium compares construction cost indices in Los Angeles, CA with Yail, CO. Assumes 30k GSF per station.
- Design premium includes HVAC and cosmetic improvements beyond basic package.
- Costs TBD. Current assumption is \$2.5 to \$5 million per tower; potential variance driven by cladding, seismic compliance, and US manufacturing premium vs. Europe.
- Design premium based on team experience.
- Agreements to locate towers on public land would likely take the form of a ground lease, but are conservatively included here at fair market value of \$250-\$350 psf for a 60'x60' or 80'x 80' parcel.
- Private aerial easement costs assumed to be \$50 psf, or roughly 25% of land fair market value, upon purchase from private sellers.

*DRAFT TERM SHEET FOR AN EXCLUSIVE NEGOTIATION AGREEMENT*

Parties	Los Angeles Aerial Rapid Transit LLC (“ARTT LLC”) and Los Angeles County Metropolitan Transportation Authority (“Metro”), each a “Party” and collectively the “Parties”
ART   Project	ARTT LLC submitted an Unsolicited Proposal with the Office of Extraordinary Innovation proposing an aerial rapid transit gondola system connecting Los Angeles Union Station (“LAUS”) and the Dodger Stadium property (“ART” or the “Project”). ARTT LLC will finance, design, build, operate, maintain, and insure the Project.
Proposed Timing	ARTT LLC requests that a Term Sheet for Exclusive Negotiation Agreement (“ENA”) be approved by October 25, 2018.
Sole Source	Metro has determined to approve the selection, on a sole source basis, of ARTT LLC for the purpose of analyzing and executing the terms and conditions of the ENA concerning the ART and for the purpose of analyzing the Project and allowing planning activities that will include a potential Services Agreement.
Negotiate Exclusively; Good Faith Negotiations	Metro and ARTT LLC desire to negotiate exclusively and in good faith concerning the Project Agreements.
Services Agreement	Metro and ARTT LLC shall work in good faith to negotiate and jointly prepare a Services Agreement that shall include, as an initial matter, provisions relating to (1) Metro’s role as the Lead Agency under CEQA and related matters; (2) a schedule of performance; (3) compensation for Metro as to reimbursement of its services for the Project; (4) consideration of ART station location in proximity to LAUS; and (5) other matters as agreed by the Parties.
Metro Obligations	CEQA. Metro has agreed to a role as the Lead Agency under CEQA.
	Property Acquisition. Metro has agreed to assist with acquisition of property and aerial easements, as necessary, for the Project pursuant to its powers under CPUC Section 30600.
	Funding Obligation. Metro has not agreed to fund, subsidize, or otherwise financially contribute in any manner toward the Project.
	Metro Discretion. Metro is not approving, committing to, or agreeing to undertake: (1) the Project or any development; (2) lease of land to ARTT LLC; or (3) any other acts or activities requiring the subsequent independent exercise of discretion by Metro.
ARTT LLC Responsibilities	Project Information. ARTT LLC shall meet with Metro and provide information and documents concerning the Project.
ARTT LLC Responsibilities (cont.)	Environmental Costs. ARTT LLC shall cover the costs associated with the preparation and certification of any required environmental documents including an EIR

	<p>under CEQA. ARTT LLC shall arrange and pay for all required CEQA studies and reviews at its sole costs and expense. Metro shall exercise its own independent judgment in the review and certification of any environmental documents prepared in connection with Metro’s consideration of the Project.</p>
	<p>Outreach. Metro and ARTT LLC shall determine the appropriate procedure for responding and handling questions from the public and local residents regarding the Project.</p>
<p>Confidentiality</p>	<p>The Parties anticipate that during the Term each may disclose and provide to the other certain proprietary and confidential information. Unless otherwise required by law, neither Party shall disclosure such proprietary and confidential information.</p>
<p>Deposit</p>	<p>On or before the Effective Date of the ENA, ARTT LLC shall submit to Metro a good faith deposit (“Deposit”) in the amount of \$50,000 as an initial payment towards Metro’s reasonable actual costs related to CEQA compliance.</p>
<p>Term</p>	<p>The ENA shall commence upon the Effective Date and shall terminate six (6) months after the Effective Date. The Parties may extend the Term for additional periods upon mutual agreement of the Parties.</p>



# EXHIBIT I

Exhibit I is related to Comment GO14-58 and GO14-60. This Exhibit material was considered in the Response to Comment GO14-58 and GO14-60.

ADVERTISEMENT

SPORTS

# Dodgers' owners to pay \$14 million a year to rent parking lots from McCourt entity

BY BILL SHAIKIN  
MAY 4, 2012 12 AM PT



The Dodgers' new owners will pay \$14 million per year to rent the parking lots from an entity half-owned by Frank McCourt, according to land-use documents intended to "facilitate the orderly development" of the property surrounding Dodger Stadium.

The potential uses for the property include shops and restaurants, homes and offices, and another sports venue, according to documents obtained Friday by The Times. The documents also discuss the possibility of parking structures on the land.

Mark Walter, the Dodgers' controlling owner, said Friday that his group is not contemplating any development at this time.

"Someday, there could be," he said. "We have no plans to build now. We have no plans for parking structures now. In the next 100 years, that could easily happen."

Guggenheim Baseball agreed to a 99-year lease with the company that owns the parking lots, a joint venture between McCourt and an entity affiliated with the new team owners. Walter said McCourt would get some portion of the annual \$14-million rent, after accounting for expenses and return on investment.

The \$10 Dodger Stadium parking fee will be collected by Guggenheim. Aside from the annual lease payment, Walter said McCourt would not share in any team revenue, including parking fees.

According to the documents, Guggenheim has the authority to sell naming rights to Dodger Stadium. The McCourt-Guggenheim joint venture that owns the parking lots has the authority to sell naming rights to any "non-baseball professional sports facility" on the site.

Dodgers President Stan Kasten said this week that the team has no plans to sell naming rights to the stadium. Although some Dodgers bidders reportedly spoke with the NFL about the league's interest in a football stadium on the site, Walter said his group did not.

"We have not talked to the NFL," Walter said.

In addition to another sports facility, the potential property uses cited in the document include homes, offices, restaurants, shops, entertainment venues, medical and academic buildings, and a hotel and exhibit hall.

Construction on the parking lots would reduce the available parking spaces — now 19,000, according to the documents. Parking structures could replace spaces lost to construction.

The City of Los Angeles and Major League Baseball would have to approve any reduction below 16,500 parking spaces, although the documents specify that MLB would get a say "if and only if the team is then playing home games at the stadium."

Kasten also said the Dodgers have no plans to move from Dodger Stadium.

Tony Natsis, the Los Angeles attorney who represented McCourt in land-use negotiations, confirmed that neither McCourt nor Guggenheim had immediate plans for development.

He said the document was designed to be flexible in accommodating whatever ideas McCourt and Guggenheim might have to build out the property over the next 25 to 50 years, citing as examples the restaurants and clubs surrounding AT&T Park in San Francisco and Petco Park in San Diego.

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"It is an ill-conceived concept that the highest and best use of Chavez Ravine is 260 acres for parking," Natsis said. "I consider that to be an ill-conceived notion for the owner of the parking lots and the owner of the stadium."

McCourt owns the Los Angeles Marathon, and the race course starts at Dodger Stadium. The document permits the continued use of the stadium for the race, with the company that owns the parking lots paying the Dodgers \$40,000 each year.

The Dodgers initially filed the land-use documents under seal in U.S. Bankruptcy Court. After an attorney for The Times objected, the Dodgers withdrew the documents, waiting to file them with the Los Angeles County recorder's office until the team sale closed this week.

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*Times staff writer Roger Vincent contributed to this report.*

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## Dodgers to add shops, a museum and garages

BY BILL SHAIKIN AND DAVID ZAHNISER

APRIL 24, 2008 12 AM PT



TIMES STAFF WRITERS

The Dodgers today plan to unveil their most extensive stadium renovation yet, a project that would transform the area behind the outfield to an entrance promenade featuring restaurants, shops, club offices and a Dodgers museum and add two parking garages to help replace the 2,000 spaces lost to construction.

In a letter sent Wednesday to season-ticket holders, owner Frank McCourt and President Jamie McCourt said the improvements would "give the stadium a chance to remain viable and perhaps see its 100th birthday."

The Dodgers would not confirm the project cost or other specifics, but a news release from the office of Mayor Antonio Villaraigosa put the cost at \$500 million. The McCourts purchased the Dodgers -- and their stadium and surrounding parking lot -- for \$430 million four years ago.

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The McCourts' letter did not detail the renovations, but the plan would enact a vision Frank McCourt outlined when he bought the team in 2004 -- to transform at least part of the parking lot into an area offering dining and shopping for fans who arrive early and stay late, avoiding pregame and postgame traffic.

The Dodgers would generate additional revenue as well, not only on game days but from year-round use of the new facilities. The Dodgers briefed civic leaders and community groups this week on the project, targeted for completion in 2012.

City Councilman Ed Reyes, whose district includes Dodger Stadium, said the project would surround the ballpark with a ring of greenery, with parks and plazas "almost like a campus setting," so fans could walk from a garage onto a tree-lined walkway leading to an entrance, or to the retail cluster.

"They are not just dropping a box in a middle of a parking lot," Reyes said.

The garages could present a challenge to fans who complained last year after the Dodgers altered longtime parking and traffic rules. The Angels sued the city of Anaheim over proposed development of their stadium parking lot two decades ago, arguing that fans preferred surface-level parking to multi-level garages. (The Angel Stadium garages never were built.)

However, according to a source familiar with the project, the Dodger Stadium garages would have tiered entrances and exits to ease traffic flow, with new underground parking complementing the garages.

Dodger Stadium opened in 1962. In their letter, the McCourts said they were committed to the stadium "for the long haul" but made it clear it could not survive deep into the new century without these new attractions.

"The viability of a 50-year-old ballpark comes into question when you realize that, come next year, Dodger Stadium will be the third-oldest in baseball," the letter read.

Once the two New York teams move into new stadiums next year, the only older ballparks in use will be Boston's Fenway Park, which opened in 1912, and Chicago's Wrigley Field, which opened in 1914.

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The plan requires City Council approval, which is expected to be a formality. Villaraigosa, Reyes and City Council President Eric Garcetti, whose district includes many of the streets used to enter and exit Dodger Stadium, will appear at today's news conference.

"This is a project that will green the area around Dodger Stadium and reduce its carbon footprint while spreading out the traffic impact on the neighborhood," Garcetti said.

The Dodgers added 1,000 parking spaces last winter by removing landscaping in the outer areas of the parking lot. Michael Kogan of the Citizens Committee to Save Elysian Park said his group would work with Garcetti to try to restore some of the greenery that he said buffered the neighborhood.

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Andy LaRoche, sidelined since tearing a ligament in his right thumb March 7, went one for six for double-A Jacksonville in the first game of a minor league rehab assignment Wednesday.

LaRoche, who did not play in the field, lined a single to right in his first at-bat and came around to score. He also grounded out three times, flied out and struck out in Jacksonville's 15-9 win over Montgomery.

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Infielder Tony Abreu, on the disabled list with what's being called a strained groin, had an MRI exam early Wednesday and was to be examined by Dr. Neal ElAttrache and the Dodgers' medical staff later in the day.

The team is growing increasingly frustrated trying to find the cause of the pain that has sidelined Abreu most of the spring. Abreu, who had his 2007 season interrupted by an abdominal problem, underwent hernia surgery in October.

-----

With the Dodgers coming off a 1-4 trip, Manager Joe Torre tinkered with his lineup, holding out second baseman Jeff Kent and elevating slumping outfielder Andruw Jones, who is still recovering from flu-like symptoms, to the second spot in the batting order for the first time since 2004.

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Times staff writer Kevin Baxter contributed to this report.

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## New Dodgers Stadium Reveal: We Got Trees!

44

By [Dakota Smith](#) | Apr 24, 2008, 11:59am PDT | [44 comments](#)

Courtesy of [Dodgers web site](#), the newest look at the forthcoming changes coming to Dodgers stadium. As [previously mentioned this morning](#), the stadium is getting a \$500 million upgrade that focuses on the perimeter of the stadium, such as planting **2,000 trees** and adding a landscaped grand plaza. Architecture firms Johnson Fain and HKS are behind the three component plan, which notably includes building a "Green Necklace" around the stadium. Green as in sustainable, people. The project is expected to be completed by opening day of the 2012 season. More from this morning's press conference later.

*Excerpts from the press release:*

"We're creating a new stadium without tearing down the old," said Dodger owner Frank McCourt. "That may take more effort and more resources, but we're talking about Dodger Stadium. This stadium sits in the heart of Los Angeles and in the hearts of Angelenos. The Dodgers are a world class organization, a world class brand and a franchise with a history of courage and vision. What we're announcing today honors that history by protecting and modernizing Dodger Stadium and making sure that it lives on and thrives for the next 50 years."

The three parts:

- **Dodger Way** - A dramatic, new tree-lined entrance will lead to a beautifully landscaped grand plaza where fans can gather beyond center field. The plaza will connect to a modern, bustling promenade that features restaurants, shops and the Dodger Experience museum showcasing the history of the Dodgers in an interactive setting.
- **Green Necklace** - The vibrant street setting of Dodger Way links to a beautiful perimeter around Dodger Stadium, enabling fans to walk around the park, outdoors yet inside the stadium gates. This Green Necklace will transform acres of parking lots into a landscaped outdoor walkway connecting the plaza and promenade to the rest of the ballpark.
- **Top of the Park** - The Green Necklace connects to a large scale outdoor plaza featuring breathtaking 360 degree views spanning the downtown skyline and Santa Monica Bay, the Santa Monica and San Gabriel Mountains, and the Dodger Stadium diamond.

This renewal plan comes on the heels of extensive stadium improvements since Frank and Jamie McCourt became stewards of the Dodgers in 2004. Past improvements include replacing nearly all of the seats in the stadium bowl; planting a new playing field and upgrading the warning track; renovating the concourses with updated concessions and other amenities; and reconfiguring stadium parking.

As a result of these extensive improvements, the stadium will become a destination for fans all year long and a place where, especially on game days, families can go early and stay late. Dodger Stadium will be a place to visit year-round to shop, dine and play.

"We hope to deliver all the modern amenities and conveniences of new ballparks, while protecting and preserving the greatest and most romantic venue in professional sports," said Dodger President Jamie McCourt. "Families will have a reason to come early and stay late any day of the year. Getting to the ballpark will be easier and spending time at the ballpark will be more comfortable and more fun."

As part of the ambitious stadium project, the Dodgers will "Think Blue and Act Green." The stadium will become as environmentally responsible a baseball stadium as there is in America. The Dodgers plans reflect the environmentally-sensitive practices supported by the Natural Resources Defense Council in their "Team Greening Program," a collaboration with Major League Baseball. The new facilities will be designed to meet silver "LEED" sustainability standards.

The renovations call for planting trees around the stadium and a focus on conserving water as well as promoting recycling and other environmental initiatives. The Dodgers will use the latest technologies to save millions of gallons of water each year. Recycling measures include post-consumer waste recycling, and recycling materials that will be removed throughout the building process. The Dodgers will use native or drought-resistant plants for landscaping and, where possible, energy efficient bulbs in all stadium and scoreboard lighting. Other environmental practices will include installing energy efficient appliances in all kitchen and concession facilities, and purchasing building materials and items used in concession kiosks that are made from recycled or quality, durable products.

The ambitious stadium improvement plan also addresses the need for operational enhancements including completing the concourse transformations, started this year with the Field Level Concourse, to include new restrooms, concession facilities and improved kitchen areas so food for fans and guests can be prepared in a fast and convenient manner. In addition to the **new Dodger Experience museum, new buildings will include the ultimate Dodger retail store and a central ticketing facility for fans**. Above these uses, there will be room for Dodger-related office space and work areas for onsite security personnel, Dodger operational staff and the Dodgers Dream Foundation. Parking improvements include two terraced parking structures on either side of the stadium that will replace existing surface parking, along with below-grade parking under the two new plazas.

"We commit to embodying the vision and spirit of this storied Dodger franchise," Frank McCourt said. "We're keeping this wonderful ballpark where it is, and providing more

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gathering places in the heart of Los Angeles. When completed in 2012, Dodger Stadium will continue to reflect the world class history and future of this storied franchise.”

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# Stadium makeover is unveiled

BY DYLAN HERNANDEZ AND BILL SHAIKIN  
APRIL 25, 2008 12 AM PT



TIMES STAFF WRITERS

Dodgers owner Frank McCourt unveiled plans Thursday for a historic makeover of the 275-acre Dodger Stadium site in Chavez Ravine, describing new features designed to transform the ballpark by 2012 into a year-round destination for dining, shopping and recreation that will be fan- and environment-friendly.

Speaking at a morning news conference in the Dodger Stadium outfield, McCourt outlined a sweeping \$500-million project that would include parking structures, a Dodgers history museum and a landscaped plaza behind center field connecting to shops and restaurants.

"It's not just for the fans," he said. "It's for the entire community."



McCourt said the improvements would allow the 46-year-old landmark -- the second-oldest park in the National League after Chicago's Wrigley Field -- to flourish for another 50 years.

The privately financed makeover would cost more than the \$430 million McCourt paid for the team and stadium four years ago.

He challenged civic leaders to follow his investment by extending bus and subway lines to the ballpark.

"The ultimate way to improve access to Dodger Stadium is public transit," McCourt said.

Mayor Antonio Villaraigosa said he would be happy to work with the Dodgers on finding ways other than driving to get people to the stadium.

"That clarion call, that challenge, I like that," Villaraigosa said at the news conference. "Isn't it amazing that we built a public transportation system and it never connected to Dodger Stadium? Wouldn't it be great if we said, 'This city is going to also rectify the errors of the past' and do something to change that? I like that idea. Let's get working on it."

McCourt said the loss of about 15 acres of parking, or about 2,000 spaces, would be offset by the construction of two parking garages -- a first for Chavez Ravine -- and additional underground parking. The renovations would include a dedicated bus lane running directly to a transit plaza next to the stadium.

McCourt said he hoped local leaders would "tweak and adjust subway lines" to add a Dodger Stadium stop and provide "bus access in the interim."

City Councilman Ed Reyes, whose district includes Dodger Stadium, said the ballpark renovation "hopefully can stimulate a whole new transit system that gets us in and out of this great place."

It remains unclear who would pay for such transit. The Los Angeles County Metropolitan Transportation Authority faces a \$1-billion deficit over the next 10 years, spokesman Rick Jager said.

There are no plans to redirect a rail line toward Dodger Stadium, he added.

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City transportation officials last month said they were exploring ways to reroute a DASH line to the ballpark but that there were two issues: money and the inconvenience to regular riders.

However they arrive at the stadium, fans would find new, environmentally friendly features that drew praise from Joel Reynolds, director of the Natural Resources Defense Council's urban program.

Citing the expanded use of water- and energy-conserving fixtures and the planting of 2,000 trees, Reynolds said Dodger Stadium has the potential to be "the most environmentally sustainable stadium in the country." He also cited the environmental benefits of preserving rather than tearing down the stadium itself.

By creating new public gathering spots such as the outfield promenade, museum and top-of-the-park terrace, the Dodgers are seeking to bring customers out early, keep them there late and even attract visitors on non-game days.

"It's increasingly clear that fans want these types of amenities," said David Carter, a sports marketing consultant and executive director of the USC Sports Business Institute.

Barry Prevorne of Moorpark, who shares season tickets and estimates that he attends 25 games a season, said he would consider visiting Dodger Stadium in the off-season.

"It depends on what kind of facilities they put there," he said.

"I live 45 minutes away. So if the facilities are worthwhile, I might come out. If it's not worth 45 minutes, there's no way. A game? Of course I'm going to come."

McCourt said the Dodgers filed paperwork Thursday to acquire the necessary permits for the stadium improvements and that he hoped work could begin after the 2009 season.

The Dodgers already plan to renovate the stadium's loge level, as well as the home and visiting clubhouses, during the next off-season. McCourt said the club was also considering installing high-definition scoreboards.

McCourt has spent at least \$110 million in stadium improvements in the last four years, including at least \$70 million since last season upgrading the field level.

The owner said the economic downturn would not affect his plans.

"Economies go up and down, they're not static," McCourt said.

"We look at this thing in a very, very long-term, also generational fashion. We're not making these decisions based on what the economy is like today. We're making these decisions as huge optimists in the future of the Dodgers."

He declined to comment on whether he would pursue additional projects on the rest of the site, and refused to say whether he would rule out residential development or the addition of an NFL stadium.

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Times staff writers Steve Hymon and Kevin Baxter contributed to this report.



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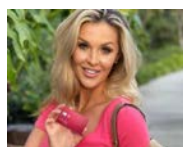
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Brian Vander Brug / Los Angeles Times

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Brian Vander Brug / Los Angeles Times



DODGERS NOW

## Rick Caruso, Joe Torre withdraw from bidding to buy Dodgers



BY BILL SHAIKIN  
STAFF WRITER | FOLLOW

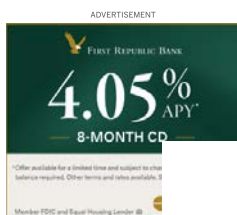
FEB. 23, 2012 2:33 PM PT



*This article was originally on a blog post platform and may be missing photos, graphics or links. See [About archive blog posts](#).*

Rick Caruso and former Dodgers manager Joe Torre have withdrawn a joint bid to buy the Dodgers, three people familiar with the sale process said Thursday.

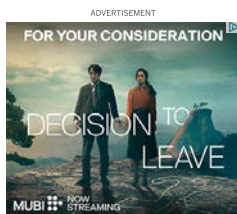
Caruso cited owner Frank McCourt's refusal to include the Dodger Stadium parking lots in the sale, according to the people, who declined to be identified because they were not authorized to discuss the sale process.



In [this letter to Major League Baseball](#), Caruso and Torre explain why they are withdrawing from the Dodgers bidding process.

Caruso could reenter the bidding if McCourt were to agree to sell the parking lots, the people said. McCourt has told people he has at least one bid in which the buyer would let him retain ownership of the parking lots.

Caruso is the Los Angeles developer perhaps best known for the Grove and Americana shopping and entertainment complexes. He commissioned studies on how to improve parking and traffic at Dodger Stadium and ultimately decided he could not provide the desired fan experience without control of the parking lots.



Caruso and other bidders have believed the purchase of the parking lots would be negotiable. Caruso's decision to withdraw offers the clearest evidence yet that McCourt intends to keep the lots and try to build on them.

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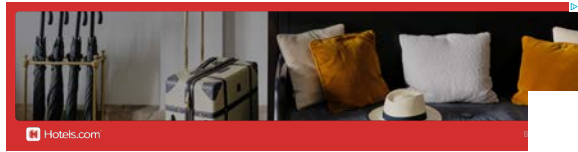
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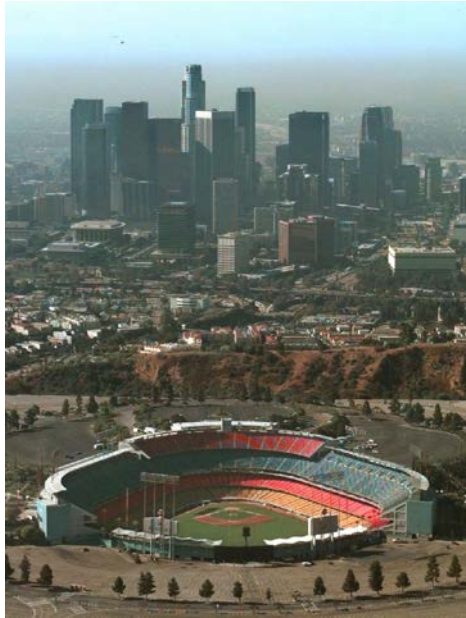
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### Stadium land seen as Dodgers key

Making property generate cash is viewed as vital for new owners by JOHN GITTELSOHN AND NAJIA BRANDT BLOOMBERG NEWS | April 8, 2012 at 2:32 a.m.



Dodger Stadium, shown in 1995, sits on valuable property less than 2 miles from Los Angeles City Hall.

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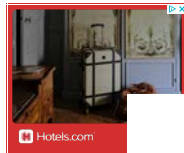
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LITTLE ROCK — The new owners of the Los Angeles Dodgers will need more than great play on the field to justify the record \$2.15 billion they paid for the baseball team. They need to transform the real estate surrounding Dodger Stadium into a moneymaker, succeeding where their predecessors failed.

Exploiting the property's value will take years, more capital and lengthy government review, said David Carter, sports business professor at the University of Southern California's Marshall School of Business.

Television rights alone won't be enough, said Lee Ohanian, an economics professor at the University of California, Los Angeles.

"The most likely source could be development of that land," Ohanian said in a telephone interview.

New owners led by Guggenheim Partners LLC Chief Executive Officer Mark Walter, sports executive Stan Kasten and former Los Angeles Laker Earvin "Magic" Johnson haven't outlined plans for the 250 acres near downtown. Past owners including Frank McCourt, who agreed to sell on March 28, unsuccessfully proposed everything from a team museum to a football stadium, leaving the area little changed since 1962.

"It's a vital piece," Carter said in a telephone interview. "It's a longer slog to get there — they will get there — as opposed to licensing and media rights, which take a year or so."

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The Dodgers will celebrate their 50th season at the stadium in Chavez Ravine, less than 2 miles north of Los Angeles City Hall, at a home opener Tuesday against the Pittsburgh Pirates. As part of the purchase, parking lots and undeveloped land surrounding the stadium were sold for \$150 million to a joint venture of McCourt and affiliates of Guggenheim Baseball Management LLC.

The new owners will need to generate about \$50 million in additional earnings a year, beyond baseball operations and TV rights, to produce an annual return of about 8 percent on their investment before taxes, Ohanian said. That's because they paid \$650 million more than the \$1.5 billion he estimates that the team is worth.

"I was surprised by the \$2.15 billion," Ohanian said. "It didn't seem to make sense."

The Dodgers reported earnings of \$11.3 million before interest and amortization in the 12 months ending March 2011, according to court documents. Ticket sales accounted for \$102.9 million of the \$286.5 million in revenue, followed by \$49.9 million for broadcast rights.

#### RECORD PRICE

McCourt had been seeking at least \$1.5 billion for the team, people familiar with the bidding who asked not to be named because the process was confidential.

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The \$2.15 billion price tops the \$1.1 billion Stephen Ross paid for the National Football League's Miami Dolphins, a record for a professional sports franchise. The previous record for a Major League Baseball team was the \$845 million that Joe Ricketts, founder of TD Ameritrade Holding Corp., paid Tribune Co. in 2009 for the Chicago Cubs and Wrigley Field.

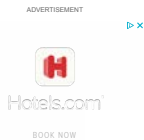
Media rights have provided the biggest source of new revenue for major-league teams, said Michael Rapkoch, president of Sports Value Consulting LLC, who has provided studies for about 80 baseball, football, basketball and hockey franchises.

The Texas Rangers signed a 20-year, \$3 billion TV contract with News Corp.'s Fox Sports in 2010 and reached the World Series the past two seasons. Last year, the Los Angeles Angels of Anaheim signed a similar contract with Fox, allowing the team to acquire two top free agents, hitting standout Albert Pujols and pitcher C.J. Wilson.

McCourt put the Dodgers into Chapter 11 last June, after baseball Commissioner Bud Selig rejected a new TV contract with Fox Sports, which holds the rights through the 2013 season. The sale must be completed by April 30, according to a divorce settlement with his ex-wife Jamie McCourt, who is owed \$131 million.

McCourt may collect more than \$1 billion from the sale, before taxes, after paying off creditors and his ex-wife, according to Carter.

The Dodgers' controlling business partner will be Walter, who oversees \$125 billion in assets at Guggenheim, which has headquarters in Chicago and New York. Michelle Lee, a spokesman for the partnership, declined to comment on plans for the real estate or stadium.



Others in the partnership include Kasten, a former president of the Atlanta Braves and Washington Nationals, and Johnson, the Hall of Fame Lakers guard whose post-basketball career has included real-estate investing and development.

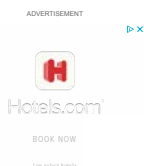
The new owners may have to spend as much as \$400 million to renovate the stadium and improve the team, said Kenneth Lombard, president of Johnson's development company from 1992 to 2004.

"Over the years, it has been thought of for mixed-use and housing or as the place for a football stadium," said Lombard, now a business partner of Capri Capital Partners, a Chicago-based real-estate investment firm with \$3.6 billion in property and financial investments. "I think we're probably looking at a three- to five-year horizon during which you could make something happen if you're focused."

While the Los Angeles commercial real-estate market hasn't recovered from the recession, Chavez Ravine's potential value comes from its proximity to downtown, "almost within walking distance of 300,000 jobs," said Carl Muhlstein, an executive vice president at the downtown Los Angeles office of Cushman & Wakefield Inc.

#### STADIUM SAFETY

The owners will also have to improve traffic and safety at the stadium to win support of the neighbors and the city before new development is approved, said City Councilman Ed Reyes, who represents the area and is chairman of the council's planning and land-use management committee.



"I'd be more than happy to work with them," Reyes said in a telephone interview. "But this is not the old rancho days when I just give you a piece of land because I like you."

On opening day last year, a San Francisco Giants fan suffered severe brain injuries when he was beaten in the Dodger Stadium parking lot. The Dodgers finished the season 82-79, or 13th out of the 30 Major League teams.

McCourt, who made his fortune as a parking-lot developer in Boston, bought the team for \$430 million in 2004 and sold it after MLB accused him in bankruptcy court of being "unable to properly distinguish between his personal interests and those of the club."

McCourt's price broke down to \$330 million for the team and \$100 million for the real estate, including the stadium. Under the terms of his sale to the Guggenheim group, the property without the stadium has a \$300 million value.

A football-stadium proposal for Chavez Ravine would face competition from two other investment groups trying to lure an NFL franchise to the Los Angeles area, which hasn't hosted a home team since 1994, before the Rams moved to St. Louis and the Raiders returned to Oakland.

A Chavez Ravine football stadium is "something I'm sure behind the scenes gets a bit of whisper activity right now because the land is entitled" for use for sporting events, said Lombard, Johnson's former business partner. "Having said that, looking at mixed-use options is probably the buyers' primary focus."



For example, the owners of the NFL's New England Patriots developed a 1.3 million-square-foot complex adjacent to Gillette Stadium. Patriot Place's shopping center, movie theaters, hotel and medical center attract visitors on nongame days. AEG built an entertainment-and-hotel complex called L.A. Live in downtown Los Angeles, across the street from Staples Center, home of the Lakers.

The San Francisco Giants baseball team last week announced plans for a \$1.6 billion office, housing and retail project for its stadium parking lot.

#### LOSING BIDS

The winning group for the Dodgers was chosen by McCourt over offers from billionaire Steve Cohen, who runs hedge-fund manager SAC Capital Advisors LP, and Stan Kroenke, who owns the NFL's St. Louis Rams and Arsenal of English soccer's Premier League. Cohen and Kroenke didn't respond to requests for comment.

Rick Caruso, a Los Angeles-based developer, dropped out of the bidding after McCourt insisted on keeping a share of the land and parking rights, he said in a Feb. 27 interview with Bloomberg Television.

Chavez Ravine was home to a community of predominantly Mexican immigrants who were driven out under a plan to build public housing. When the Dodgers left Brooklyn for Los Angeles in 1958, the land was an incentive for owner Walter O'Malley to move west.

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Few teams control real estate with the potential value of Chavez Ravine, said Roger Noll, professor emeritus of economics at Stanford University. Unlike fans in other cities, most Dodgers lovers are a captive audience with limited access to public transit and few options for dining nearby. The new owners may boost revenue by adding amenities to the property.

"I don't know a stadium where there's so much land associated with a sports team," Noll said in a telephone interview. "At the time it was built, it was state of the art. But obviously it's out of date now."

Information for this article was contributed by Christopher Palmeri, Steven Church and Scott Soshnick of Bloomberg News.

Business, Pages 63 on 04/08/2012

Print Headline: Stadium land seen as Dodgers key


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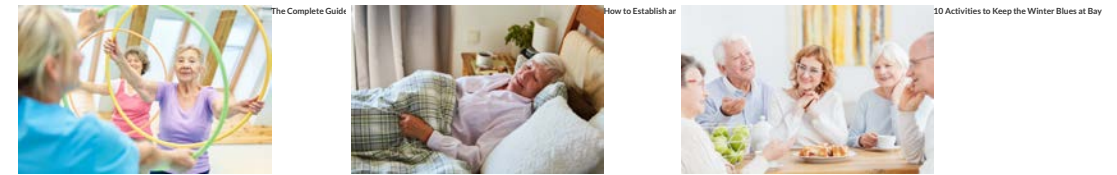
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SPORTS

# Developing Chavez Ravine is likely in play for new Dodgers owner

BY ROGER VINCENT AND KEN BENSINGER, LOS ANGELES TIMES  
APRIL 16, 2012 12 AM PT



It's a developer's dream — nearly 300 empty acres above downtown Los Angeles, close to three major freeways and visited by millions each year.

Could Chavez Ravine be the next big real estate play in town?

The new owner of the Dodgers, Guggenheim Baseball Management, is keeping tight-lipped about its plans for the parking lots and hillsides surrounding Dodger Stadium, which it will own jointly with departing team owner Frank McCourt if the sale closes as expected April 30.

[INTERACTIVE: Breakdown of Dodger property](#)

The Dodgers disclosed some details of the McCourt-Guggenheim land partnership in the team's bankruptcy case, but those documents were under seal — and the team quickly withdrew them after The Times asked the bankruptcy judge to release them publicly.

Real estate experts, however, say it's likely the new owner is looking to do more with the land than simply park cars. They point out that the rich price paid by Guggenheim — at \$2.15 billion, a record for a sports franchise — suggests it will need to add new revenue streams in addition to what is expected to be a lucrative television contract.

"There is probably a media or a real estate play," said Stan Ross, chairman of the USC Lusk Center for Real Estate, who was quick to add that any development would likely take years to realize.

One doesn't have to scout far for a glimpse of potential development plans. Four years ago, McCourt proposed a \$500-million plan to ring the stadium with restaurants, shops and a Dodgers museum. The surface parking spaces lost to new buildings would be replaced by twin nine-story garages.

The plans never went anywhere amid the economic downturn and the team's precarious finances, but it's clear that McCourt wasn't the only one to see new development possibilities.

Among those in the bidding for the Dodgers were real estate entrepreneurs Rick Caruso, Jared Kushner and Tom Barrack. And Magic Johnson, one of the nation's most prominent urban developers, has a minority stake in the Guggenheim partnership.

Developer Ken Lombard, a former business partner of Johnson, said the Dodgers property is ideally situated for an urban development.

"You could create a community up there," said Lombard, who runs the Baldwin Hills Crenshaw Plaza shopping center. "You have the chance to do something very interesting, probably a mixture of residential and retail."

There would be even more potential if the baseball stadium were to be relocated downtown, as many have suggested. AEG Entertainment President Tim Leiweke, who is leading plans to build an NFL football stadium downtown, said a downtown baseball stadium would be among other possible options if the football stadium were derailed.

Beverly Hills apartment developer Alan Casden, another unsuccessful bidder for the Dodgers, had made relocating the stadium a cornerstone of an earlier proposal to buy the team in 2003.

At that time, Casden criticized Dodger Stadium for convoluted parking lots, a poor seating plan and a location inconvenient for both fans and nearby residents who bear the brunt of traffic, noise and litter in their neighborhood.

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Jan. 15, 2023

Tearing down Dodger Stadium, the third-oldest major league ballpark, would likely draw opposition from preservationists. The Los Angeles Conservancy has not taken a position on the issue, but its executive director, Linda Dishman, has a soft spot for the 50-year-old stadium.

"My favorite thing is looking out from the top deck. It feels like you're so close you can touch the skyline of downtown," Dishman said.

At 50, Dodger Stadium is now eligible to be listed on the National Register of Historic Places. If it achieved such a designation, the owner would find it more difficult to get city approval to destroy it, make substantial changes or sell naming rights.

In 2004, Chicago's Wrigley Field was landmarked, a move the Cubs' ownership opposed. The team was sold in 2009 and the new owners have asserted that the status costs the Cubs \$30 million a year in lost sponsorship opportunities.

Even if the stadium doesn't get official landmark designation, earning the backing to raze it or build additions on the parking lots such as condos or a shopping center would not be an easy feat, said Gail Goldberg, former city planning director.

Owners can be expected to look for "higher and better" uses for their property that will produce more financial rewards, she said. Their challenge is to convince local officials that their plans are good for economic development and to convince local stakeholders such as neighbors that the plan will improve their quality of life.

That the publicly unpopular McCourt is still involved is an added hurdle to building support for real estate development, she said.

"I think nobody wants to help him make more money," Goldberg said. "As long as his name is out there, the public benefit [of development] would have to be extraordinary."

Although the Boston native is giving up half his interest in the parking lots, Bankruptcy Court filings show that McCourt will retain complete control of five parcels comprising nearly 20 acres of land immediately adjoining them.

McCourt also owns an entire city block between College Street and Figueroa Terrace, just down the hill from the stadium. Purchased in 2008 for \$9.1 million, the block holds a small house and a commercial building with the offices of the L.A. Marathon, which McCourt also owns.

The price McCourt paid is more than triple what the land sold for in 2004 and 2005; the block borders the 110 Freeway and its Sunset Boulevard exit, which could be an attractive feature should the city ever expand road access to Dodger Stadium.

Major roadwork and other large-scale improvements to ease ingress and egress to the ravine would probably be necessary for meaningful development to take place, architect and real estate advisor Ann Gray said.

"It's not an easy site to get in and out of," Gray said. "The paradox is that the only way to relieve traffic is to build more. It will alleviate the bottleneck at the start and end of games. Even great mass transit will not do that."

With the exception of the Figueroa Terrace properties, almost all of McCourt's holdings are zoned as agricultural or open space, as are the parking lots. To build on them, a potentially difficult rezoning would be required.

City Councilman Ed Reyes, whose district includes Chavez Ravine, is taking a wait-and-see approach to development around the stadium, though he did voice support for McCourt's plan in 2008.

"There is a critical path that we have to cross that speaks to our ability to create jobs while making it better for everybody, not just the people who come for three hours and then go," he said.

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[ken.bensinger@latimes.com](mailto:ken.bensinger@latimes.com)

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ELYSIAN HEIGHTS LOS ANGELES DEVELOPMENT

# Everyone Betting on Dodger Stadium Land Development

36

By [Adrian Glick Kudler](#) | Apr 17, 2012, 12:45pm PDT | [36 comments](#)

Decades after the last residents were cleared out of Chavez Ravine, development at the site is still a perennially hot topic. Now that the Dodgers and their Chavez Ravine stadium [have sold to Guggenheim Baseball Management](#), [the LA Times is speculating](#) on what will happen to the 300 acre site (which includes many acres of parking lots, still partly owned by much-hated former Dodgers owner Frank McCourt). According to the paper, real estate experts "say it's likely the new owner is looking to do more with the land than simply park cars. They point out that the rich price paid by Guggenheim — at \$2.15 billion, a record for a sports franchise — suggests it will need to add **new revenue streams** in addition to what is expected to be a lucrative television contract." Stan Ross of the USC Lusk Center for Real Estate guesses that "There is probably a media or a real estate play." And don't forget that new minority stakeowner Magic Johnson is a real estate investor (his Canyon-Johnson Urban Fund has worked with [940 East 2nd St.](#), [One Santa Fe](#), and [Sunset & Vine](#)).

During the few short good years, McCourt proposed [a massive Chavez Ravine development](#) around the stadium that would've added retail, restaurants, a Dodger museum, garages to replace lost parking, and open space and promenades. And practically since Dodger Stadium was built, people have been suggesting that it be relocated Downtown—now with the proposed South Park NFL stadium plan, those noises are getting a bit louder (NFL stadium developer AEG says that "a downtown baseball stadium would be among other possible options if the football stadium were derailed.") Of course, that would mean tearing down the MLB's third oldest ballpark, which is just old enough to be eligible for the National Register of Historic Places (And wouldn't that be a fun preservation battle to watch go down?).

According to the *LAT*, McCourt gave up half of his parking lot shares, but "will retain complete control of **five parcels comprising nearly 20 acres of land** immediately adjoining them." And it turns out that in 2008 he also picked up "an entire city block between College Street and Figueroa Terrace, just down the hill from the stadium," for \$9.1 million. The site is right next to the 110 Freeway exit, so McCourt will be right in the way if the city ever wants to expand the access there—which it will probably need to do if Chavez Ravine gets redeveloped.

- [Developing Chavez Ravine is likely in play for new Dodgers owner](#) [LAT]
- [Mccourt Sells Dodgers But Keeps Stake in Stadium Parking Lots](#) [Curbed LA]



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# EXHIBIT J

Exhibit J is related to Comment GO14-59 and GO14-63. This Exhibit material was considered in the Response to Comment GO14-59 and GO14-63.



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**Agenda - Final**

**Wednesday, November 16, 2022**

**9:00 AM**

To give written or live public comment, please see the top of page 4

## **Ad Hoc 2028 Olympics Committee**

*Hilda Solis, Chair*

*Ara J. Najarian, Vice Chair*

*James Butts*

*Jacquelyn Dupont-Walker*

*Eric Garcetti*

*Gloria Roberts (Interim), non-voting member*

*Stephanie Wiggins, Chief Executive Officer*

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(ALSO APPLIES TO BOARD COMMITTEES)

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A member of the public may address the Board on agenda items, before or during the Board or Committee's consideration of the item for one (1) minute per item, or at the discretion of the Chair. A request to address the Board must be submitted electronically using the tablets available in the Board Room lobby. Individuals requesting to speak will be allowed to speak for a total of three (3) minutes per meeting on agenda items in one minute increments per item. For individuals requiring translation service, time allowed will be doubled. The Board shall reserve the right to limit redundant or repetitive comment.

The public may also address the Board on non agenda items within the subject matter jurisdiction of the Board during the public comment period, which will be held at the beginning and/or end of each meeting. Each person will be allowed to speak for one (1) minute during this Public Comment period or at the discretion of the Chair. Speakers will be called according to the order in which their requests are submitted. Elected officials, not their staff or deputies, may be called out of order and prior to the Board's consideration of the relevant item.

Notwithstanding the foregoing, and in accordance with the Brown Act, this agenda does not provide an opportunity for members of the public to address the Board on any Consent Calendar agenda item that has already been considered by a Committee, composed exclusively of members of the Board, at a public meeting wherein all interested members of the public were afforded the opportunity to address the Committee on the item, before or during the Committee's consideration of the item, and which has not been substantially changed since the Committee heard the item.

In accordance with State Law (Brown Act), all matters to be acted on by the MTA Board must be posted at least 72 hours prior to the Board meeting. In case of emergency, or when a subject matter arises subsequent to the posting of the agenda, upon making certain findings, the Board may act on an item that is not on the posted agenda.

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The Committee Meeting begins at 9:00 AM Pacific Time on November 16, 2022; you may join the call 5 minutes prior to the start of the meeting.

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La Reunion de la Junta comienza a las 9:00 AM, hora del Pacifico, el 16 de Noviembre de 2022. Puedes unirse a la llamada 5 minutos antes del comienso de la junta.

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Please include the Item # in your comment and your position of "FOR," "AGAINST," "GENERAL COMMENT," or "ITEM NEEDS MORE CONSIDERATION."

Email: BoardClerk@metro.net

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Los Angeles, CA 90012

**CALL TO ORDER****ROLL CALL**

6. **SUBJECT: MOBILITY LESSONS LEARNED FROM WORLD SPORTS EVENTS** [2022-0770](#)

**RECOMMENDATION**

RECEIVE oral report on Mobility Lessons Learned from World Sports Events.

**Attachments:** [Presentation](#)

7. **SUBJECT: 2028 GAMES MOBILITY CONCEPT PLAN** [2022-0781](#)

**RECOMMENDATION**

APPROVE the 2028 Games Mobility Concept Plan - 2022 Prioritized Mobility Concept Plan Project List (Attachment A).

**Attachments:** [Attachment A - 2022 Prioritized MCP Project List](#)  
[Attachment B - Motion 42: 2028 Mobility Concept Plan](#)  
[Attachment C - Comprehensive Project List](#)  
[Presentation](#)

- SUBJECT: GENERAL PUBLIC COMMENT** [2022-0773](#)

RECEIVE General Public Comment

Consideration of items not on the posted agenda, including: items to be presented and (if requested) referred to staff; items to be placed on the agenda for action at a future meeting of the Committee or Board; and/or items requiring immediate action because of an emergency situation or where the need to take immediate action came to the attention of the Committee subsequent to the posting of the agenda.

**COMMENTS FROM THE PUBLIC ON ITEMS OF PUBLIC INTEREST WITHIN COMMITTEE'S SUBJECT MATTER JURISDICTION****Adjournment**



## Board Report

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File #: 2022-0770, File Type: Oral Report / Presentation

Agenda Number: 6.

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**2028 OLYMPICS COMMITTEE  
NOVEMBER 16, 2022**

**SUBJECT: MOBILITY LESSONS LEARNED FROM WORLD SPORTS EVENTS**

**ACTION: RECEIVE ORAL REPORT**

**RECOMMENDATION**

RECEIVE oral report on Mobility Lessons Learned from World Sports Events.

**ISSUE**

At its September 2022 meeting, Director Solis requested a report back on mobility lessons learned from previous world sports events.

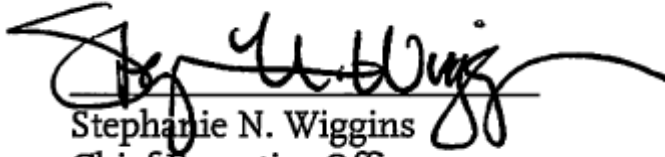
**EQUITY PLATFORM**

Nearly 90% of the proposed venues in Los Angeles County for the 2028 Games are within Equity Focused Communities (EFCs). The lessons learned offer best practices to enhance mobility during the 2028 Games to keep the region moving and minimize the disruption of quality of life for all Angelenos, especially EFC populations. The lessons learned from this presentation provide insight into how to leverage infrastructure for the Games to create legacy benefits, such as enhanced mobility, accessibility, connectivity, workforce development, and economic opportunity.

Like in previous major events, parking restrictions and road closures at venues may impact high ridership lines during the 2028 Games. Staff is working on preparing demand data to understand the potential impacts of the Games. When data becomes available, Metro can identify and mitigate service impacts to riders along high-ridership lines during the Games. The lessons learned incorporate best practices for reducing the impact on disadvantaged communities and overcoming these mobility challenges, including accessibility parking, transit detours, and implementation of the Games Route Network.

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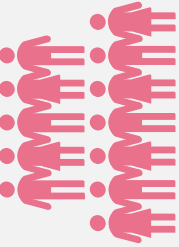
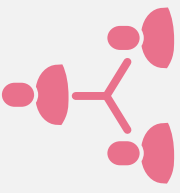

Major Events  
Lessons  
Learned



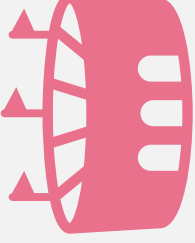
## Agenda


- LA 1984
- London 2012
- Rio 2016
- Super Bowl LVI
- LA Sports Equinox Day (Oct 28, 2018)
- MLS Cup Final & USC Game (Nov 5, 2022)


# LA 1984: What's changed?

LA COUNTY	1984	2028 (anticipated)
 Population	8M	12M
 Employment	3.5M	5M
 Average Delay per Vehicle/Commuter	60 hours	120 hours

## GAMES


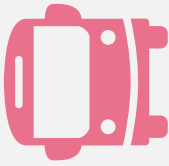
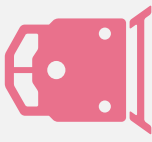
 **35%**  
more sporting  
events

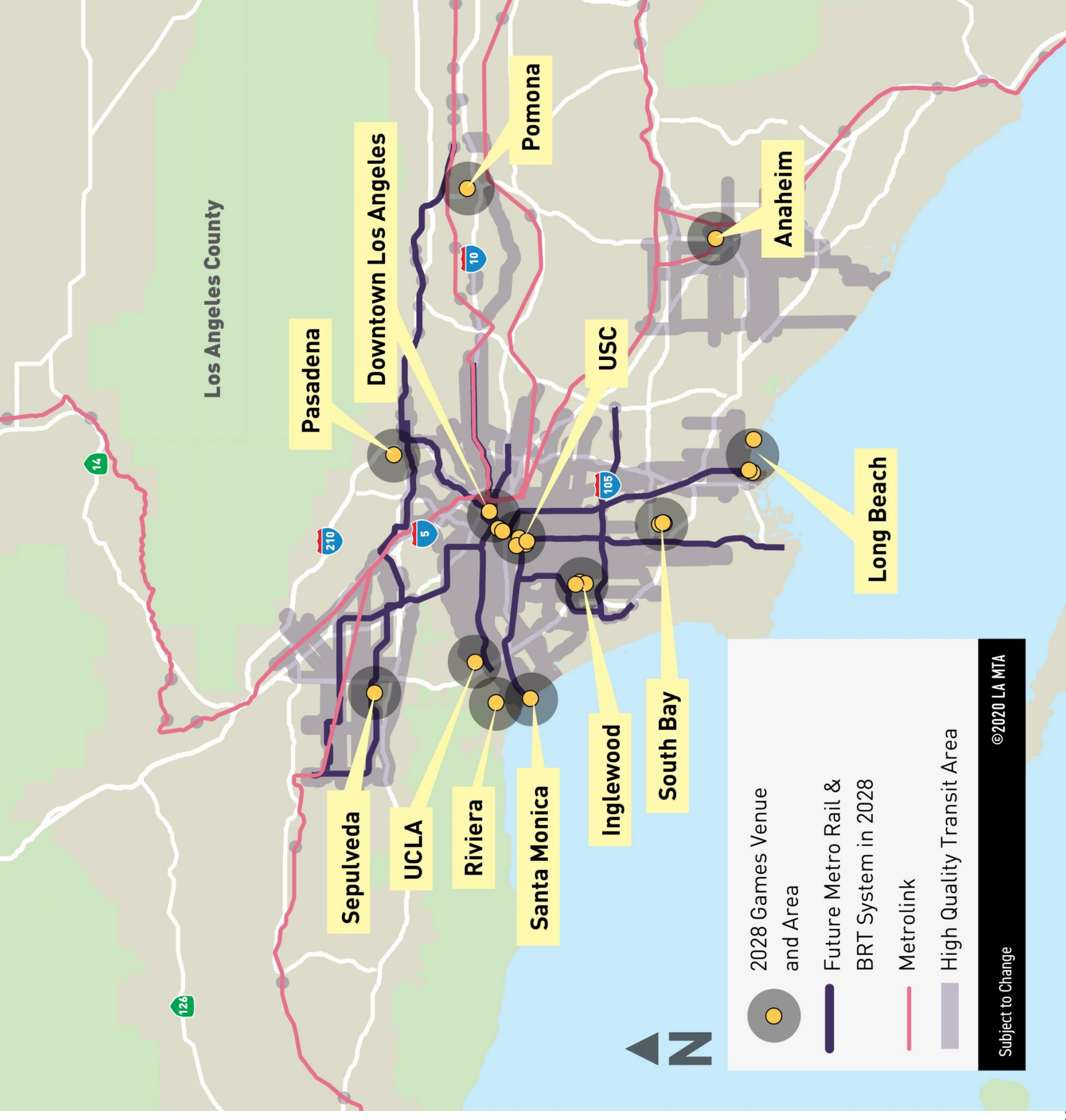
 **2X**  
the amount  
of athletes

 **3X**  
the amount of  
media coverage



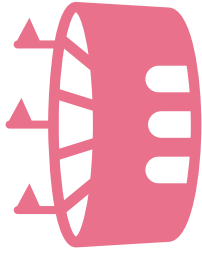
# LA 1984: What's changed?

MOBILITY	Miles in 1984	Miles in 2028 (anticipated)
 Metro Rail	0	134
 Metro BRT	0	74
 Metrolink	0	538



# LA 1984: Leveraging Strategies for Success

## 1984 Games



### SPECTATORS

### GENERAL PUBLIC

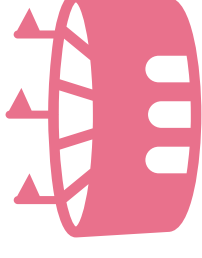
- Transit marketing
- Express bus service
- Event Scheduling
- HOV system
- Dynamic traffic signal system (ATSAC)
- One-way streets
- Ramp closures
- Encouraged vacations
- Reduced non-essential travel
- Flexible work schedules
- Retimed truck traffic
- Remote working

HIGHLY EFFECTIVE

MODERATELY EFFECTIVE

LEAST EFFECTIVE

## WHAT IS STILL APPLICABLE AND CAN BE SUCCESSFUL IN THE 2028 Games?



### SPECTATORS

### GENERAL PUBLIC

- Transit marketing
- Express bus service
- Dynamic traffic signal system
- Flexible work schedules
- Retimed truck traffic
- Remote working (proven during the COVID pandemic)

## London 2012

- First car-free Games but has significantly more robust public transit system and culture
- UK government established the Olympic Delivery Authority to deliver venues and infrastructure
- London's GRN was highly successful but used local arterials, not freeways like current LA proposal
- London had to coordinate with 40 transit operators, similar coordination effort is needed in LA

**£6.5 BILLION**

**15%**

LONG TERM

**10%–16%**

**62 MILLION**

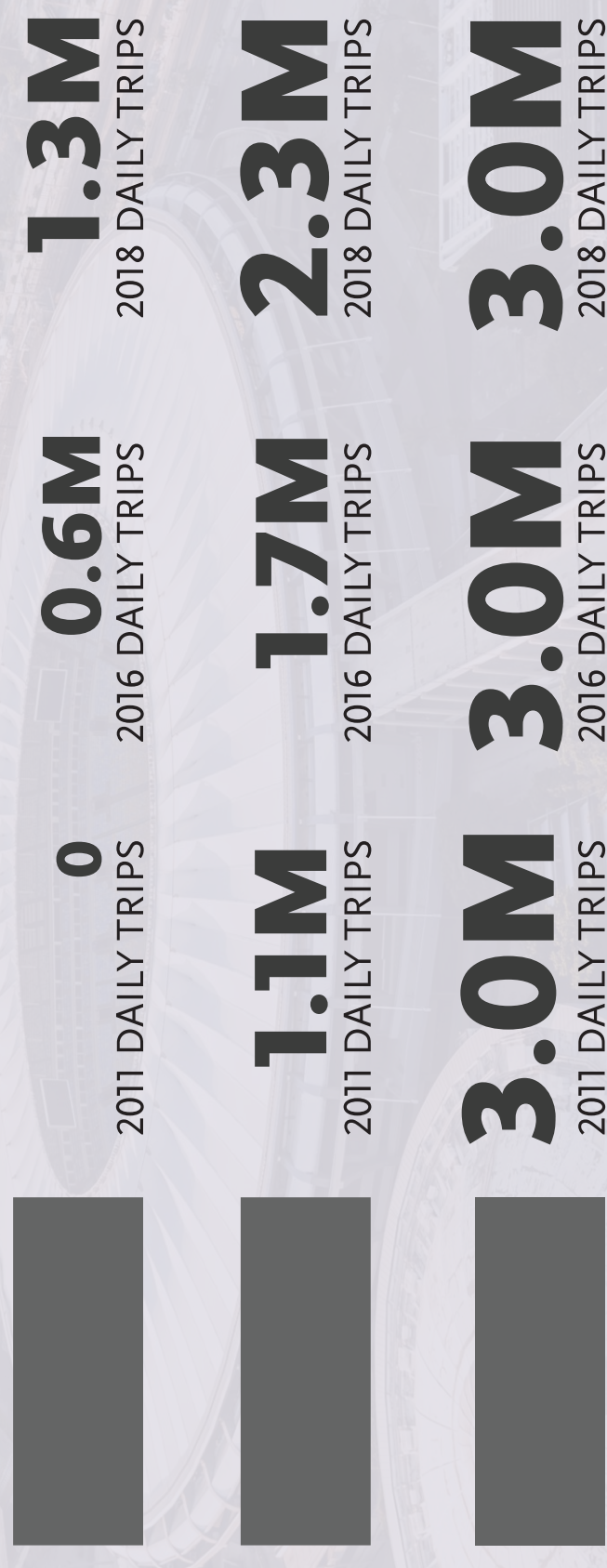
THE GAMES

**100,000 TRIPS**

ACCESSIBLE SHUTTLES

## Rio 2016

- Focused on building BRT routes
- Used the Games as a catalyst/accelerator to deliver large transit projects
- Used the 2014 World Cup to test and pilot mobility strategies
- Multiple city centers and Games dispersed into four sports parks
- Rio encountered what Los Angeles will encounter:
  - Public health, safety and security issues
  - Construction cost issues
- The Games Route Network used Rio's arterial network; not urban freeways like Los Angeles



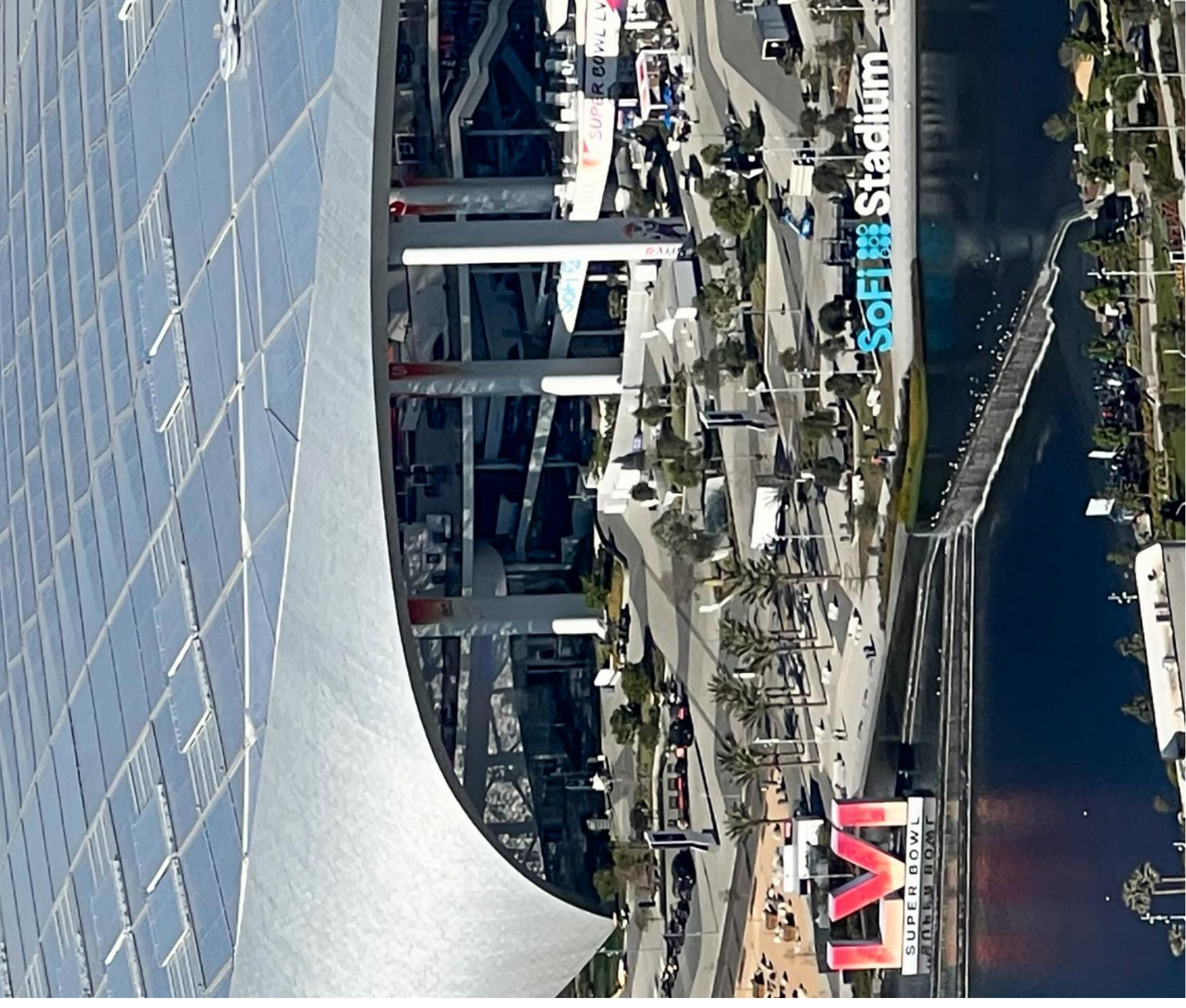
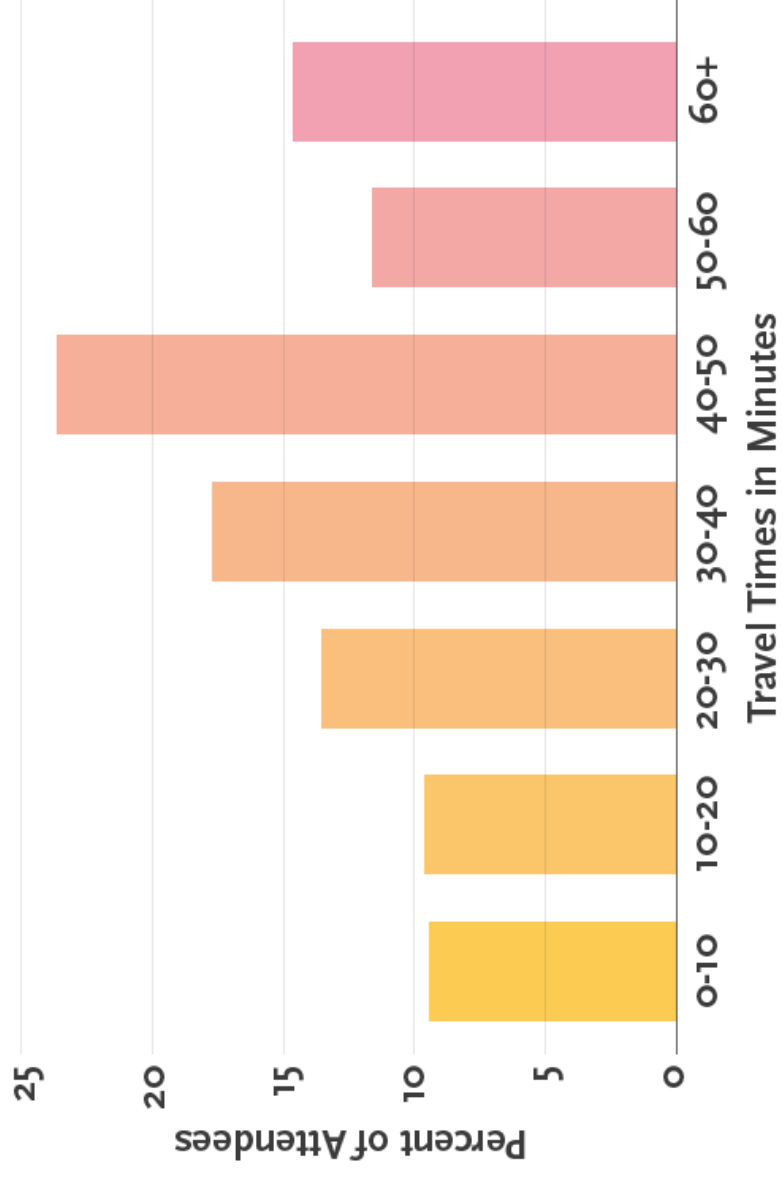
## Common Roles & Responsibilities of Metro's Equivalent at other Major Events

- Created and prioritized needs assessments for essential mobility investments
- Stewarded planning and delivery of mobility projects
- Conducted transportation modeling for demand on transportation systems including Games Route Network (GRN)
- Led TDM marketing, communications, strategies, and program
- Provided mobility services for spectators and general public

## Super Bowl LVI

- Of the approximately 75,000 who attended, nearly half came from outside LA County
- Most out-of-town attendees stayed within 5 miles of SoFi Stadium on game day
- Trips within 5 miles that would take about 10 minutes on a regular day tripled to an average of 37 minutes

**Super Bowl  
Attendee Travel  
Times within  
5 Miles of  
SoFi Stadium**



## LA Sports Equinox Day

- First time all five major men's sports leagues hosted games in LA on the same day
- Provides insight into what a typical 2028 Games event day might be like, including travel patterns and congestion hot spots
- Top 5 most common corridors traveled to get the venues used during the LA Sports Equinox Day:
  - I-110/SR-110 Harbor Freeway
  - I-405 Santa Monica Freeway
  - I-5 Golden State Freeway
  - SR-60 Pomona Freeway
  - SR-91 Gardena Freeway

## Los Angeles Sports

### Equinox Timeline

#### KINGS

Crypto.com  
Arena

#### RAMS

Memorial  
Coliseum

21,000  
capacity

78,467  
capacity

11:00 am - 4:00 pm

10:30 am - 6:00 pm

#### ARRIVAL AND DEPARTURE PROFILES

#### GALAXY DODGERS CLIPPERS

Dignity Health  
Sports Park

Dodger  
Stadium

Crypto.com  
Arena

27,000  
capacity

56,000  
capacity

21,000  
capacity

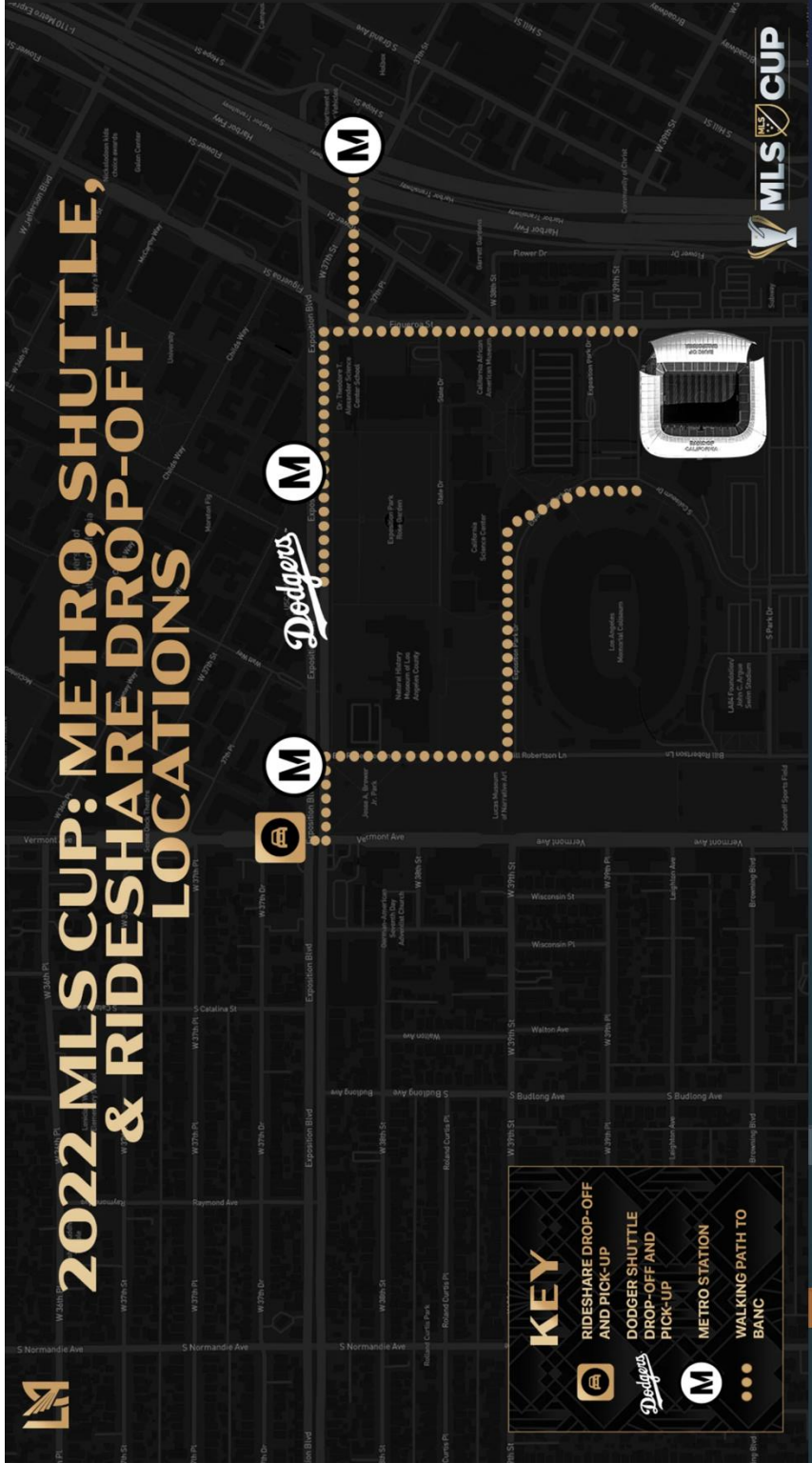
12:30 - 4:30 pm

4:00 - 10:00 pm

5:30 - 9:30 pm

## MLS Cup Final and USC Game Day

- MLS Cup Final scheduled for 1pm; USC Game scheduled for 7:30pm – no parking at USC/Expo Park for MLS Game
- *Private shuttle bus service* – provided by MLS from Dodger Stadium, 9 am to 6 pm; 500 car and 1500 riders used this service.
- *Metro Rail* - E Line Service increased to 10-minute headway, 9AM to 7PM; 8 to 10-minute headway after 7PM w/ 3-car trains
- **3x more ridership compared to a non-event Saturday**
- *Metro Bus*
  - Silver Line service was promoted by Metro and LAFC.
  - Extra standby buses provided 10 am – 7 pm
  - **5x more ridership compared to a non-event Saturday**





## Best Practices that Apply to Metro for 2028

- Use the Games as a catalyst to deliver high performing transit for all Angelenos
- Lead TDM program including freight policies
- Lead transportation modeling for demand on transportation systems including Games Route Network (GRN)
- Create integrated ticketing that includes venues and transit
- Implement trip planning applications with first-last mile strategies
- Increase ridership with permanent mode shift by improving customer experience and enhancing the existing network
- Develop a program management approach to deliver MCP prioritized projects
- Create a central, multiagency transportation operations center to manage all transport operations

# EXHIBIT K

Exhibit K is related to Comment GO14-64. This Exhibit material was considered in the Response to Comment GO14-64.

# Comprehensive MCP Project List

(Note: Some projects have been renamed, bundled, or re-scoped)

MODE/TYPE	PROJECT NAME	DESCRIPTION	ORIGIN	COMMENTS
Active Transportation/ First-Last Mile	A Line Station FLM Improvements and Mobility Hubs	Walking, biking, and mobility infrastructure within 1/2 mile radius of Artesia, Downtown Long Beach, Grand/LATTC, and Pico stations.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	E Line FLM Improvements and Mobility Hubs	Walking, biking, and mobility infrastructure within 1/2 mile radius of Santa Monica, Culver City, Crenshaw, Vermont, and USC stations.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	Inglewood Transit Connector	Fully elevated, automated, fixed transit system with three stations connecting Metro K Line to Inglewood's new activity centers.	Draft Initial Project List	
Active Transportation/ First-Last Mile	K Line Station FLM Improvements and Mobility Hubs	Walking, biking, and mobility infrastructure within 1/2 mile radius of Fairview Heights, Downtown Inglewood, and Aviation/96th stations.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	Metro Active Transportation (MAT) Approved Projects	Corridor projects include Avalon-MLK-Gage, Randolph, Redondo Beach, 1st-Riggin-Potrero Grade, Huntington-Main/Fremont. FLM projects include Hollywood/ Highland, Hollywood/Vine, East LA Civic Center, LAX/Aviation, Olympic/26th, Western/Slauson, Sepulveda, Downtown Long Beach, and Santa Monica/La Brea.	Draft Initial Project List	
Active Transportation/ First-Last Mile	Metro Bike Share Expansion/ Subsidy / TAP Enhancements	Expansion of the Metro Bike Share systems/locations near venues and along the Games Route Network. Increased subsidy for 500,000 bike share rides. Develop free transfers and improved security for cash payments for bike share trips.	Draft Initial Project List	
Active Transportation/ First-Last Mile	Protected Bike Lanes/Cycle Tracks Parallel to GRN	Installation of Class IV bike routes/paths that parallel the Games Route Network to promote biking to the venues.	Draft Initial Project List	

**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Active Transportation/ First-Last Mile	Stations/Venues Wayfinding and Circulation Improvements	Improved signage and communications system for navigation between mobility options and venues.	Draft Initial Project List	
Active Transportation/ First-Last Mile	Countywide Safe Routes to School Program	Establish a countywide Safe Routes to School Program aimed at bringing safety improvements to streets connecting to the highest need schools.	Draft Initial Project List	
Active Transportation/ First-Last Mile	Countywide Vision Zero Program	Establish a countywide Vision Zero program aimed at reducing the occurrence and severity of collisions, prioritizing highest need areas.	Draft Initial Project List	
Active Transportation/ First-Last Mile	D Line Station FLM Improvements and Mobility Hubs	Walking, biking, and mobility infrastructure within 1/2 mile radius of Westwood/VA and Westwood UCLA stations.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	Eastside Access Improvements	Project includes crosswalk improvements at 23 intersections, new bike lanes, sidewalk widening, and tree planting along 5 miles of city streets.	Draft Initial Project List	
Active Transportation/ First-Last Mile	Metro Bike Hub Improvements	Enhancements to amenities and bike parking, and increased staffing at bike hubs. Implement Bike Hubs at key locations near Games venues.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	Figueroa Street Open Street	Open and car-free streets to create non-motorized mobility options between USC, LA Live, and Grand Park.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	G Line Station FLM Improvements and Mobility Hubs	Walking, biking, and mobility infrastructure within 1/2 mile radius of Balboa, Woodley, and Sepulveda stations.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	J Line Harbor Gateway Transit Center Mobility Hub/Park & Ride	Walking, biking, and mobility infrastructure with park and ride between Harbor Gateway Transit Center and South Bay Sports Park.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	L Line Station FLM Improvements and Mobility Hubs	Walking, biking, and mobility infrastructure within 1/2 mile radius of San Dimas, La Verne, and Memorial Park stations.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	LA River Path	Proposed walking/bicycling path to close an existing 8-mile gap in the active transportation network along the LA River.	Draft Initial Project List	
Active Transportation/ First-Last Mile	LA Union Station Forecourt and Esplanade Improvements	Reconstruct Alameda and Los Angeles Streets along the frontage of Union Station with widened sidewalks for pedestrian and bike paths.	Draft Initial Project List	

**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Active Transportation/ First-Last Mile	Metro Active Transportation (MAT) Waitlist Projects	Waitlisted projects include Florence, Van Nuys/Vanowen, Fountain (Hayworth-Harper), San Monica-Greenacre, Fairfax, Santa Monica-Poinsettia, and Santa Monica-Hayworth.	Draft Initial Project List	
Active Transportation/ First-Last Mile	Metro Bike Share Subsidy	Increased subsidy for 500,000 bike share rides.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	Metro Bike Share TAP Enhancements	Develop free transfers and improved security for cash payments for bike share trips.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	Metro Micro Expansion	Expansion of existing Metro Micro program to the Games venues.	Draft Initial Project List	
Active Transportation/ First-Last Mile	Rail to River ATC - Segment B	Proposed walking/bicycling path between the A Line Slauson Station to the LA River.	Draft Initial Project List	
Active Transportation/ First-Last Mile	Bicycle Valet	Free and safe bicycle parking for events to encourage and enable cycling to events where parking for bikes is scarce, non-existent, and prone to theft.	Draft Initial Project List	
Active Transportation/ First-Last Mile	I-710 LA River Bike Path	Proposed walking/bicycling path along the LA River, specifically along I-710, which connects Maywood to Long Beach.	Draft Initial Project List	
Active Transportation/ First-Last Mile	LA River SFV Greenway	Proposed walking/bicycling path along the LA River in the San Fernando Valley.	Draft Initial Project List	
Active Transportation/ First-Last Mile	Metro Bike Hub Expansion	Implement Bike Hubs at key locations near Games venues.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	Ocean Boulevard Open Street	Open and car-free streets to create non-motorized mobility options between Long Beach Civic Center and Long Beach Pier.	Draft Initial Project List	Bundled
Active Transportation/ First-Last Mile	Transit to Parks CBO Outreach and Partnership	Partnering with CBOs to increase awareness among park-poor communities of transit connections to the Games venues that are park facilities.	Draft Initial Project List	
Active Transportation/ First-Last Mile	Universal Station Mobility Hub	Dedicated mobility hub to provide residents additional options for accessing the B Line, bus lines, and other transit service	Draft Initial Project List	

**ATTACHMENT C – Comprehensive MCP Project List**

MODE/TYPE	PROJECT NAME	DESCRIPTION	ORIGIN	COMMENTS
Active Transportation/ First-Last Mile	Holly Garage Mobility Hub	Holly's proximity to the Memorial Park Station makes it an ideal candidate to be a mobility hub for the games. I'd like to find a way to add secure bike parking, potentially micromobility parking/storage, and to serve as a location for TNC pick-up and drop off (potentially on Arroyo adjacent to the garage).	Agency	
Active Transportation/ First-Last Mile	Bike Lanes to the Bowl	Stripe bike lanes from Memorial Park Station to the Rose Bowl and back. Provide a dedicated and properly signed path to the Rose Bowl from the Memorial Park L Station and back. Would likely need a shuttle stop nearby in case the uphill ride back is not feasible.	Agency	
Active Transportation/ First-Last Mile	ArroyoLink	Multimodal connection between Arroyo Blvd/the Rose Bowl to Colorado Blvd providing a key connection between the pedestrian and bicyclist activity in the Rose Bowl area to Old Pasadena, and the transit network of the Metro L line, the proposed North Hollywood to Pasadena BRT, the existing Metro Rapid bus and the numerous local and regional bus transit lines served by Metro, Pasadena Transit and Foothill Transit. This project includes a new pedestrian and bike path along Arroyo Blvd, south of the Rose Bowl and between Arroyo Blvd to Colorado Blvd/ Orange Grove Blvd, which begins near the intersection of Arroyo Blvd and Arroyo Drive. The ArroyoLink also provides an opportunity to connect the Arroyo Seco Bike path (which currently extends as far north as South Pasadena) into Pasadena.	Agency	
Active Transportation/ First-Last Mile	East San Fernando Valley First Last Mile (ESFV FLM)	Walking, biking, and mobility infrastructure within 1/2 mile radius of the ESFV rail corridor	Agency	
Active Transportation/ First-Last Mile	Rail to River Segment A	Proposed walking/bicycling path between the Crenshaw Line and A Line Slauson Station.	Agency	
Active Transportation/ First-Last Mile	Car Free Streets	Open street or car free street projects around venues to support spectators, revelers, and local businesses near games venues.	Agency	Bundled

**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Active Transportation/ First-Last Mile	Stress Free Connections	Targeted investments along neighborhood streets to support regional access to destinations. The network of local streets offers a ‘stress-free’ travel experience for people walking, biking, and rolling.	Agency	
Active Transportation/ First-Last Mile	Active transportation & Vision Zero	Support transportation via zero emissions and active modes	Agency	
Active Transportation/ First-Last Mile	Aerial Rapid Transit	Proposed project to connect Los Angeles Union Station to the Dodger Stadium via an aerial gondola system in Downtown Los Angeles	Agency	
Active Transportation/ First-Last Mile	Open Streets Program	Figueroa btw USC and 7th/Metro, Expo Blvd btw Vermont and Flower, MLK Blvd btw Vermont and Figueroa, Ocean Ave btw Wilshire and Pico, Flower btw Pico and 11th, Ocean Blvd btw Pacific and Shoreline, Balboa Blvd btw Burbank and Victory	Task Force	
Active Transportation/ First-Last Mile	Toro Hub	Mobility hub at the campus of Cal State Dominguez Hill	Task Force	Bundled
Active Transportation/ First-Last Mile	Transit Venue Ped/Bike Access Enhancements	Walking, biking, and active transportation street improvements on critical access streets, within the 1/4 mile radius of 10 venues: Long Beach Pier; Dignity Park; Sepulveda Basin, UCLA; LA Live; Grand Park; Dedeaux Field; USC; The Forum; and Downtown Long Beach.	Task Force	
Active Transportation/ First-Last Mile	Cabrillo Mole Intermodal Ferry Passenger Terminal	The Cabrillo Mole is a multimodal transportation hub used by cross-channel carrier passengers traveling between the mainland and Avalon and as a gathering place for residents and visitors.	Task Force	
Active Transportation/ First-Last Mile	BlueLA Expansion	Car sharing with new, fully-electric vehicles for everyday needs	Task Force	
Active Transportation/ First-Last Mile	USC Expo Park Pedestrian Bridges	Two Pedestrian bridges over Expo Blvd connecting USC and Expo Park and the E Line stations	Task Force	

**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Active Transportation/ First-Last Mile	Los Angeles Universities Mobility Hubs	New mobility hubs at the universities in Los Angeles will support the 2028 Games and students before and after the Games. This includes mobility hubs at UCLA to support the Athletes Villages, at USC to support the Media Village, at Cal State Long Beach to support park-and-ride to the Long Beach Sports Park, and at Cal State Northridge to support park-and-ride to the Valley Sports Park.	Task Force	
Bus	Broadway Bus Only Lane & TSP (NexGen Improvements)	This project provides improved speed, reliability, and frequency	Draft Initial Project List	
Bus	Bus Headway/ Frequency Management Program	Dynamic scheduling wherein the rider can expect a bus on a given line or corridor at a regular interval as opposed to arrivals at specific published scheduled times. Assume this would apply to Metro's top 20 corridors in terms of ridership.	Draft Initial Project List	Converted to recommendation
Bus	NextGen Bus Priority Enhancements and Improvements along GRN	Speed up service along key bus routes on Games Route Network by creating bus-only lanes, bulb-outs, and transit signal priority, including bus stop amenities like lighting, real-time info, and shelter/shade canopies.	Draft Initial Project List	
Bus	Connecting C Line and Metrolink Norwalk Station	New express bus service between the C Line Norwalk Station and Metrolink Norwalk Station to close the existing transit gap.	Draft Initial Project List	Bundled
Bus	G Line Improvements	Upgrade the G Line with two grade separations, better signal priority technology, electronic bus connectivity, and a four-quadrant gating system.	Draft Initial Project List	
Bus	J Line Electrification Project	Install 40 charging stations and infrastructure at Division 18 and 10 en-route charging stations to enable uninterrupted zero emission bus service.	Draft Initial Project List	
Bus	Local Municipal Operators Call for Projects	Placeholder for potential projects and operations for local municipal transit operators through a call for projects.	Draft Initial Project List	
Bus	NoHo to Pasadena BRT	New BRT Service that provides high-capacity, fast connection between the San Fernando and San Gabriel Valleys.	Draft Initial Project List	



**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Bus	North SFV Transit Improvements	This project provides improved speed, reliability, and frequency for San Fernando Valley transit riders, including CSUN.	Draft Initial Project List	
Bus	Vermont BRT	New BRT Service that provides high-capacity, fast connection between Koreatown and South LA. BRT to supplement and not preclude future rail corridor.	Draft Initial Project List	
Bus	Zero Emission Bus Master Plan - Phase 2	Procurement of Zero Emission Bus vehicles for local, rapid, shuttle, and express routes. Conversion of "dependent" Divisions (Divisions 1, 2, 3, 5, 7, and 13) from CNG to battery charging.	Draft Initial Project List	Cannot be done by 2028
Bus	Zero Emission Bus Master Plan - Phase 3	Procurement of Zero Emission Bus vehicles for local, rapid, and express routes. Conversion of Divisions 8, 9, 15, and 18 from CNG to battery charging.	Draft Initial Project List	Cannot be done by 2028
Bus	All-Door Boarding Expansion	All door boarding expansion along higher volume Games-impacted routes. If time permits conduct analysis to determine high volume routes near venues.	Draft Initial Project List	Converted to recommendation
Bus	Atlantic Bus Only Lane & TSP (NexGen Improvements)	This project provides improved speed, reliability, and frequency	Draft Initial Project List	
Bus	Camera Bus Lane Enforcement	Implement camera-based technology to enforce bus-only lane use along key BRT and bus-only lane corridors.	Draft Initial Project List	
Bus	Cesar Chavez/ Sunset to Glendale Bus Only Lane & TSP (NexGen Improvements)	This project provides improved speed, reliability, and frequency	Draft Initial Project List	
Bus	Frequent Bus Interior Cleaning	Increase routine cleaning for high-frequency buses with high ridership to improve cleanliness.	Draft Initial Project List	
Bus	La Cienega Bus Only Lane & TSP (NexGen Improvements)	This project provides improved speed, reliability, and frequency	Draft Initial Project List	
Bus	Games Route Network Bus Circulator	Enhanced and express bus service between LAX and the venues/hotels within the four sports parks during the Games.	Draft Initial Project List	

**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Bus	Lincoln Blvd BRT	New BRT service along Lincoln Blvd. consistent with Board-adopted standards & design guidelines, such as dedicated running ways & BRT stations.	Draft Initial Project List	Cannot be done by 2028
Bus	Bus Terminal Improvements	Implements speed and reliability improvements at terminal stations to ultimately allow buses to run every 5 to 10 minutes.	Draft Initial Project List	Bundled
Bus	San Gabriel Valley Transit	Depending on the result of the study, this assumes BRT service within the San Gabriel Valley to replace the Eastside Transit Corridor Route 60 Alternative.	Draft Initial Project List	
Bus	Systemwide Bus Layover Improvements	Bus layover improvements for faster turnaround time for improved service and reliability.	Draft Initial Project List	Bundled
Bus	Venice Boulevard Bus Only Lane & TSP (NexGen Improvements)	This project provides improved speed, reliability, and frequency	Draft Initial Project List	
Bus	Arbor Vitae Bus Lane	Add eastbound bus lane for dedicated route between I-405 and So-Fi Stadium.	Draft Initial Project List	Bundled
Bus	Bus Operator Backup Staff	Increases bus driver staffing levels to prevent missed assignments. Current labor shortages affect this estimate.	Draft Initial Project List	Bundled
Bus	Bus Stop Safety Relocation	Speed up service, increase pedestrian safety by relocating bus stops from nearside to farside of intersections along the Games Route Network.	Draft Initial Project List	
Bus	G Line Power & Communications Systems Upgrades	Upgrade critical systems (CTS, fiber, and UPS) to power and provide enough bandwidth for communication services for the G Line.	Draft Initial Project List	
Bus	Hawthorne/La Brea Bus Lanes	Add bus lanes on La Brea Avenue (from Market St. to Century Blvd.), and on Hawthorne Boulevard (from Century Blvd. to Hawthorne/Lennox Station).	Draft Initial Project List	Bundled
Bus	I-110 Freeway Bus Stops	Restore abandoned bus stops on I-110 freeway to avoid congestion in the downtown core.	Draft Initial Project List	
Bus	Prairie Avenue Bus Lanes	Add bus lanes on Prairie Avenue between the K Line and C Line.	Draft Initial Project List	Bundled

**ATTACHMENT C – Comprehensive MCP Project List**

MODE/TYPE	PROJECT NAME	DESCRIPTION	ORIGIN	COMMENTS
Bus	Bus zone improvements	<p>"Bus zone improvements in Central District and Northwest Pasadena, with a particular emphasis at transfer connection points, connections to the Metro L Line, and other heavily used bus stops serving the local feeder services that support the regional network, as well as those serving DACs.</p> <p>Improvements to include branding/ wayfinding, bus stop furniture enhancements, accessibility improvements, those that facilitate efficiencies of bus service (e.g., bus bulbs, etc.), security and comfort improvements (e.g., security devices, public art, etc.), upgrade Bus Finders to be able to push messaging out and to provide accessibility features; upgrades to bus stop lighting"</p>	Agency	
Bus	Pasadena Integrated Central Transit Management System Upgrade	<p>Upgrade Pasadena Integrated Central Transit Management System which is essential for all aspects of local transit operations, including AVL, connecting to the City's bus priority signal system, fare systems, dispatching, safety, routing, schedule adherence, data collection, communication to riders, and customer service. This system also enables the public to obtain real-time arrival information via smartphone apps, online, and by phone, as well as at displays at key bus stops throughout the City for the multiple transit agencies operating in Pasadena. For the Olympics, this project is essential in supporting the anticipated magnitude of transit demand and facilitating critical regional and local transit connections, including those to the Rose Bowl.</p>	Agency	
Bus	LA Express Park	Expand LA Express Park to four new high demand parking areas in the city	Agency	
Bus	LADOT Transit Projects	Electrification of LADOT entire fleet	Agency	
Bus	Bus Priority projects	Support transportation via zero emissions and active modes	Agency	

**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Bus	Washington Blvd BRT	This project would construct bus rapid transit on Washington Blvd from Walnut Ave to Fairfax Ave. As a dedicated right-of-way bus rapid transit project, it qualifies as a Tier 1 Transit project.	Agency	
Bus	Culver City Bus Battery Electric Transit Buses Purchase and Facility Electrification	This project would replace Culver City's existing CNG-powered buses with vehicles powered by battery technology. As an electric bus purchase, it qualifies as a Tier 2 Transit project.	Agency	
Bus	Culver City Transit Center Expansion	Expansion of the Westfield Culver City Transit Center to provide increased capacity for buses, passengers, and create multimodal connections.	Agency	
Bus	Antelope Valley Access	Acquisition of facilities and construction of essential facilities to ensure quality, consistent ADA paratransit services are provided.	Agency	
Bus	Eastern Region Access	Acquisition of facilities and construction of essential facilities to ensure quality, consistent ADA paratransit services are provided.	Agency	
Bus	Northern Region Access	Acquisition of facilities and construction of essential facilities to ensure quality, consistent ADA paratransit services are provided.	Agency	
Bus	Southern Region Access	Acquisition of facilities and construction of essential facilities to ensure quality, consistent ADA paratransit services are provided.	Agency	
Bus	West/Central Region Access	Acquisition of facilities and construction of essential facilities to ensure quality, consistent ADA paratransit services are provided.	Agency	
Bus	Games Mobility Hub Strategy	Implement venue mobility and central mobility hub typologies	Task Force	
Bus	Sports Park Metro Zero Emission Bus Fleet	Acquisition of zero emission buses and implementation of charging infrastructure for Metro and LADOT for routes that serve the Downtown Sports Park	Task Force	

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<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Bus	Supplemental Bus System	This project commissions a fleet for the Games to ensure a sufficient supply of buses is available to transport Games attendees. Recruit a temporary bus driver workforce to ensure there is no shortage during the Games and support them with accommodations, transportation, and meals. In addition, conduct Games-specific training of the public transit workforce to promote familiarity with the Games Route Network. Remodel existing bus depots to be Games-ready by installing cameras, fueling stations, fencing, and similar. Construct additional depots as necessary.	Agency	
Bus	Sepulveda BRT	Provide fast, frequent, reliable and accessible bus service along Sepulveda Blvd	Agency	Bundled
Bus	Event Parking and Fueling Facilities	Additional parking and fueling infrastructure for approximately 1,000 event buses during the games.	Draft Initial Project List	Bundled
Congestion Management	Arterial Network Traffic Signal Analytics	Implement location-based services to measure the performance of intersection traffic signals at locations throughout LA County including the Games Route Network	Draft Initial Project List	
Congestion Management	ATSAC/LARTMC Integration and Operations Enhancements	Improvements to the Automated Traffic Surveillance and Control (ATSAC) Center, which manages real-time detector loops between and at intersections, and changes the signal timing as traffic conditions change. ATSAC also supports LA Metro's ability to move its trains and buses faster.	Draft Initial Project List	
Congestion Management	Business Planning/Promotion of TDM	This is a placeholder project to allow for stakeholder engagement directly with local businesses to help them plan for the games to help decrease traffic on the network.	Draft Initial Project List	
Congestion Management	Congestion Pricing Study	Study to explore a new approach to reduce traffic by managing travel demand through congestion pricing and providing more high-quality transportation options.	Draft Initial Project List	
Congestion Management	I-10 Extension ExpressLanes	Convert existing HOV lane to single HOT lane along I-10 between I-605 and the San Bernardino County line.	Draft Initial Project List	Cannot be done by 2028

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<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Congestion Management	I-105 ExpressLanes (Segment 1)	Add HOV lane and convert to dual HOT lanes along I-105 between I-405 and I-605.	Draft Initial Project List	
Congestion Management	I-405 ExpressLanes	Convert existing HOV lane to single HOT lane along I-405 between I-10 and US-101.	Draft Initial Project List	
Congestion Management	Incentives for Households to Drive Less During Games	Pay households to drive less during Games by depositing funds in mobility wallets if they agree to reduce car use with accountability.	Draft Initial Project List	Bundled
Congestion Management	Mega Event Customer Experience Analysis	Analysis to understand potential overcrowding and crush loads at stations and transit vehicles.	Draft Initial Project List	
Congestion Management	Games Park and Ride Strategy	Identify parking lots that link to major transit lines to encourage mode shift.	Draft Initial Project List	
Congestion Management	GRN Enabling Treatments and Spot Improvements	Study to investigate all minor GRN treatments (low cost/temporary) that enable more efficient games operations such as pavement, signage, traffic signals, and minor civil works.	Draft Initial Project List	
Congestion Management	Regional Incident Management Program and Tools	Implementation of a regional incident management program and associated tools to streamline, coordinate, and improve the management and handling of roadway incidents.	Draft Initial Project List	
Congestion Management	Regional Traffic Management Network & Information Exchange	Enhance multi-jurisdictional traffic signal operations by enhancing local traffic signal control system connectivity and interoperability.	Draft Initial Project List	
Congestion Management	TDM Campaign	Placeholder project to provide solutions and communication strategies using the following mechanisms: reduce the need to travel; re-mode using alternative transportation; reroute to avoid congestion; and re-time to avoid the peak hours.	Draft Initial Project List	
Congestion Management	Business-as-Usual Network Planning (Non-Games Routes)	Plan the non-games network, identify preferred routes and interventions/ upgrades needed, determine operational principles during the Games.	Draft Initial Project List	Bundled
Congestion Management	HOV 3+ Policy Implementation	Convert existing HOV lane occupancy to three or more persons per vehicle countywide.	Draft Initial Project List	Bundled

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Congestion Management	I-405 Aux Lanes	Adds segments of auxiliary lanes in each direction to improve traffic flow at on/off ramps for ten miles from Florence Avenue to I-110.	Draft Initial Project List	
Congestion Management	I-710 Integrated Corridor Management	Deploy multi-jurisdictional integrated corridor management solutions on I-710 between SR-91 to SR-60.	Draft Initial Project List	
Congestion Management	LAX Congestion Pricing Study	Study to explore a new approach to reduce traffic at LAX by managing travel demand through congestion pricing.	Draft Initial Project List	
Congestion Management	Sports Park Transportation Performance Monitoring Network	Traffic signal controller and cabinets upgrades and the installation of fiber optic communication infrastructure to provide a redundant high bandwidth network in LA, Long Beach, Inglewood, Santa Monica, Carson, & Pasadena.	Draft Initial Project List	
Congestion Management	SR-710 Mobility Improvements Program	Local mobility improvements between Alhambra and Pasadena on the existing transportation system to reduce traffic bottlenecks.	Draft Initial Project List	
Congestion Management	US-101 HOV Lanes between SR-134 and I-110	Adding HOV Lanes along US-101 that is part of the Games Route Network between the International Broadcast Center and Downtown Sports Park.	Draft Initial Project List	Cannot be done by 2028
Congestion Management	Arroyo Seco Safety and Operational Enhancements	Project to reduce collisions and improve reliability on SR-110 (Arroyo Seco Parkway) from I-5 to its terminus in South Pasadena.	Draft Initial Project List	
Congestion Management	Aviation/LAX Parking Study	Capacity analysis of parking at Aviation/LAX station.	Draft Initial Project List	
Congestion Management	Curbspace Management Projects	Coordination with SCAG's Curbspace Management Study to fund and implement recommendations to the most congested & complicated curb space locations.	Draft Initial Project List	
Congestion Management	I-110 ExpressLanes Extension to I-110/I-405 Interchange*	Extend existing I-110 ExpressLanes to I-405/I-110 interchange.	Draft Initial Project List	Cannot be done by 2028
Congestion Management	I-405 Active Traffic Management & Integrated Corridor Management Strategies	System management approaches to make best use of existing roadway capacity to improve operations on I-405 from Rosecrans Avenue to SR 90.	Draft Initial Project List	
Congestion Management	I-405/I-110 Interchange and HOV Ramps*	Operational improvements to the I-405/I-110 interchange with HOV ramps.	Draft Initial Project List	

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Congestion Management	I-605 Hot Spots Projects	Projects to improve mobility and relieve congestion, capacity constraints, and other related deficiencies on I-605, which include Valley, Beverly, South, and SR-60/7th.	Draft Initial Project List	
Congestion Management	Metro Vanpool	Increased subsidy for 1,000 vanpools at \$600 per van per month.	Draft Initial Project List	Bundled
Congestion Management	Games Autonomous Vehicles Demonstration	Deployment of autonomous vehicles to support transportation needs during Games.	Draft Initial Project List	
Congestion Management	SoCal 511 Multicounty Regional Trip Planning	Enhancements and elevate trip planning information, including carpool match.	Draft Initial Project List	
Congestion Management	SR-91 Improvements (Westbound SR-91 Connector, Atlantic to Cherry, Central to Acacia)	These projects are part of Metro's SR-91/I-605 "Hot Spots" Measure R Program in the Gateway Cities to reduce traffic congestion.	Draft Initial Project List	
Congestion Management	Station Parking Improvements**	Projects include parking facility valet assist for up to 20 facilities, parking guidance system enhancements, parking kiosks, and parking pre-sale reservation system.	Draft Initial Project List	Bundled
Congestion Management	"BRT-Light" Improvements for Rose Bowl-serving Transit Corridors (e.g., Fair Oaks, Lincoln, Lake, Mountain/Seco, etc.)	<p>"Install/implement speed, capacity, and passenger trip experience improvements, concurrent with Vision 2028 goals, that result in providing higher quality and more efficient transit connections – moving more people, faster and more comfortably, to where they want to go in Pasadena – in this case, Olympic events. These improvements would be along regional and local transit corridors that are vital to supporting getting visitors to the Rose Bowl from throughout the region and the City.</p> <p>Including Signal priority/signal preemption &amp; Bus Only Travel Lanes To improve travel time on listed corridors with improvement that would leave a legacy, implementation of bus only lanes and enhanced signal priority/preemption would be deployed. These improvements are concurrent with the Nextgen Bus Plan.</p>	Agency	



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Congestion Management	I-105 Integrated Corridor Management (ICM) project	ICM: identified in Caltrans District 7 Highest Priority Corridors for Future ICM Deployment for LA County (Caltrans D7 ICM Master Plan Study, April 2021); I-105 (Begin to I-110)	Agency	
Congestion Management	I-405 Integrated Corridor Management (ICM) project	ICM: identified in Caltrans District 7 Highest Priority Corridors for Future ICM Deployment for LA County (Caltrans D7 ICM Master Plan Study, April 2021); I-405 (ORA to I-110)	Agency	Bundled
Congestion Management	I-405 Active Traffic Management & Integrated Corridor Management Strategies EA 36330	System management approaches to make best use of existing roadway capacity to improve operations on I-405 from Jefferson Boulevard (PM R25.9) and Roscoe Boulevard (PM 43.75).	Agency	Bundled
Congestion Management	LA-134-PM 0.03/13.34 (LA-101 to LA-210)	ICM, CV to support Games Route Network	Agency	
Congestion Management	I-710 Integrated Corridor Management (ICM) project	ICM: identified in Caltrans District 7 Highest Priority Corridors for Future ICM Deployment for LA County (Caltrans D7 ICM Master Plan Study, April 2021); I-710 (SR 91 to SR 60)	Agency	
Congestion Management	SR-91 Integrated Corridor Management (ICM) project	ICM: identified in Caltrans District 7 Highest Priority Corridors for Future ICM Deployment for LA County (Caltrans D7 ICM Master Plan Study, April 2021); SR-91 (Begin to I-710)	Agency	
Congestion Management	I-605 Integrated Corridor Management (ICM) project	ICM: identified in Caltrans District 7 Highest Priority Corridors for Future ICM Deployment for LA County (Caltrans D7 ICM Master Plan Study, April 2021); I-605 (ORA to I-105)	Agency	
Congestion Management	LA-101-PM S0.33/17.17 (LA-010 to LA-405)	ATM, ICM, CV to support Games Route Network	Agency	
Congestion Management	LA-010-PM R2.16/18.29 (PCH to LA-005) ICM-Lite	ICM, CV to support Games Route Network	Agency	
Congestion Management	The Shoemaker Bridge Replacement Project	Replace the Shoemaker Bridge. The new bridge will flow into SR-710 and include pedestrian and bicycle access. Additionally, bicycle, pedestrian, and street enhancements will be provided on adjacent thoroughfares	Agency	
Congestion Management	SR-14 Safety Improvements	Safety improvements along SR-14 between I-5 and Palmdale	Task Force	

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Congestion Management	Union Station and Civic Center Transit District	Alameda Street mobility enhancements to close the gap and develop a freeway cap over the 101 freeway	Task Force	
Congestion Management	GRN Design and Implementation	This project identifies, designates, and operates the Games Route Network (GRN) to create designated lanes for the Games with improvements such as signage, traffic signals, incident response, and minor civil works. The GRN will be converted to bus-only lanes where appropriate after the Games. Additional support personnel specializing in public safety, incidents, or similar will be hired as necessary to support the GRN.	Agency	
Goods/Freight Movement	Freight TDM	Placeholder project for engaging directly with freight businesses to help them plan for the games and help decrease traffic on the network.	Draft Initial Project List	
Goods/Freight Movement	Alameda Corridor Terminus Enhancements	New Cerritos channel rail bridge and supporting connections throughout Port of LA.	Draft Initial Project List	
Goods/Freight Movement	Terminal Way Grade Separation	New grade separation to replace at-grade crossing to improve freight traffic flow.	Draft Initial Project List	
Goods/Freight Movement	Clean Truck Infrastructure	Install charging infrastructure throughout LA County for zero emissions trucks.	Draft Initial Project List	
Goods/Freight Movement	I-5 North County Enhancements	Widen I-5 for approximately 17 miles between SR-14 and Parker Road Interchange.	Draft Initial Project List	
Goods/Freight Movement	Montebello Grade Separation Project	New bridge at the UP crossing at Montebello Boulevard and at Olympic Boulevard, creating a roadway underpass at both.	Draft Initial Project List	
Goods/Freight Movement	Pier 400 On Dock Rail Modernization	On-dock railyard expansion to accommodate electric operated rail-mounted gantry cranes.	Draft Initial Project List	
Goods/Freight Movement	San Pedro Waterfront Access	Improves traffic operations on key arterial connecting San Pedro to I-110 & SR-47.	Draft Initial Project List	
Goods/Freight Movement	SR-47/Navy Way Interchange	Improves traffic operations/safety on SR-47 between Vincent Thomas Bridge and Gerald Desmond Bridge.	Draft Initial Project List	

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Goods/Freight Movement	SR-57/SR-60 Interchange Improvements	Project includes building multiple on-and off-ramps, widening Grand Avenue and reconstructing the Grand Avenue bridge overcrossing.	Draft Initial Project List	
Goods/Freight Movement	Terminal Island Transfer Facility Modernization	On-dock railyard expansion to accommodate electric operated rail-mounted gantry cranes.	Draft Initial Project List	
Goods/Freight Movement	Turnbull Canyon Road Grade Separation	Separate the roadway and the Union Pacific Railroad tracks on Turnbull Canyon Road.	Draft Initial Project List	
Goods/Freight Movement	West Basin Container Terminal Railyard Modernization	On-dock railyard expansion to accommodate electric operated rail-mounted gantry cranes.	Draft Initial Project List	
Goods/Freight Movement	Zero Emission Commercial Loading Zones	Install, enforce, monitor, and evaluate new Zero Emission Delivery Zones within the Games Sports Parks.	Draft Initial Project List	
Rail	7th/Metro Center Comprehensive Station Upgrade	Holistic station refurbishment including station finishes, lighting, wayfinding, audio/security systems, restroom installation and other customer amenities, and ADA improvements.	Draft Initial Project List	
Rail	Airport Metro Connector	New light rail station, bus plaza, bicycle parking, customer service center, passenger pick-up and drop-off area, providing a direct connection to the future LAX APM.	Draft Initial Project List	
Rail	Arcadia Power Substation Upgrade	Arcadia Substation improvements to allow A and E Line to operate with 5-minute service during the games.	Draft Initial Project List	
Rail	B Line Extension for NoHo to Burbank Airport	Extension of the B Line from North Hollywood to Burbank Airport.	Draft Initial Project List	Cannot be done by 2028
Rail	C Line Station Platform Extensions and Reliability Upgrades	Replace 25-year old high-voltage traction power substations and extend station platforms at Redondo Beach, Mariposa, Douglas, and LAX/Aviation stations to accommodate three-car trains.	Draft Initial Project List	
Rail	Comprehensive Union Station Improvements	Improvements include redundant elevator and stairways, ADA/accessibility enhancements, wayfinding improvements to help visitors find their way through the station, new A Line operator restrooms, and general SOGR to the facility.	Draft Initial Project List	

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Rail	Crenshaw/LAX Transit Corridor	New light rail transit service between the E Line at Expo/Crenshaw Station to merge with C Line at Aviation/LAX Station.	Draft Initial Project List	
Rail	Crenshaw Northern Extension	Project would fill a major gap in the Metro Rail network and create an important north-south link.	Draft Initial Project List	Cannot be done by 2028
Rail	East San Fernando Valley Transit Corridor	Project is a north-south street running light rail transit corridor in the middle of Van Nuys Boulevard between the G Line and San Fernando Road and includes 11 at-grade stations along with the maintenance facility.	Draft Initial Project List	
Rail	Eastside Transit Corridor Phase 2	Proposed 9-mile light rail transit extension of the L Line further east from its current terminus at Pomona Boulevard and Atlantic Boulevard. The proposed alignment includes at-grade, aerial, and below grade configurations.	Draft Initial Project List	Cannot be done by 2028
Rail	Flower Street A & E Line Improvements	Add pedestrian islands for pedestrian crossing at Flower Street, separate crossings into roadway crossing and track crossing.	Draft Initial Project List	
Rail	Foothill Gold Line Extension Phase 2B (Pomona)	Extension of the L Line beyond the current end point in Azusa, and add stations in the cities of Glendora, San Dimas, La Verne, and Pomona.	Draft Initial Project List	
Rail	K Line Traction Power Substation Enhancements	Add new traction power substations to accommodate three-car trains and more frequent service.	Draft Initial Project List	
Rail	Light Rail Speed Improvements	Reevaluate speed commands/block design, upgrade train control system to integrate with traffic signals, gate technology for pre-emption.	Draft Initial Project List	
Rail	Pico Station Improvements	Expand Pico Station with a second platform and prevent queuing issues at station.	Draft Initial Project List	
Rail	Regional Connector	New rail line that will provide riders a seamless journey from Azusa to Long Beach, and from East Los Angeles to Santa Monica, through the downtown LA core.	Draft Initial Project List	
Rail	Sepulveda Transit Corridor	High-capacity rail line that connects the San Fernando Valley, the Westside and LAX. Options being considered are heavy rail transit (HRT) and monorail transit (MRT) and is being pursued as a potential P3 through PDA contracts.	Draft Initial Project List	Cannot be done by 2028

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Rail	South Bay C Line Extension to Torrance	Proposed light rail transit extension of the C Line (Green) along a 4-mile segment of the Harbor subdivision corridor from the existing Redondo Beach Station to the under-construction Torrance Transit Park and Ride Regional Terminal in Torrance.	Draft Initial Project List	Cannot be done by 2028
Rail	Vermont Rail	New light rail corridor that provides high-capacity, fast connection between Wilshire/Vermont to 120th Street.	Draft Initial Project List	Cannot be done by 2028
Rail	Washington Wye Junction and Flower Street Operational Improvements	Restriction of certain traffic movements and limited redesign/modifications to the junction. Add pedestrian islands for pedestrian crossing at Flower Street, separate crossings into roadway crossing and track crossing.	Draft Initial Project List	
Rail	West Santa Ana Branch Transit Corridor	New 19-mile light rail transit corridor connecting downtown Los Angeles, Huntington Park, Bell, Cudahy, South Gate, Downey, Bellflower and Artesia.	Draft Initial Project List	Cannot be done by 2028
Rail	Westside Purple Line Extension Section 1	Section 1 of the D Line extension will add three new stations: Wilshire/La Brea, Wilshire/Fairfax and Wilshire/La Cienega.	Draft Initial Project List	
Rail	Westside Purple Line Extension Section 2	Section 2 of the D Line extension will add two new stations: Wilshire/Rodeo and Century City/Constellation.	Draft Initial Project List	
Rail	Westside Purple Line Extension Section 3	Section 3 of the D Line extension will add two new stations: Westwood/UCLA and Westwood/VA Hospital.	Draft Initial Project List	
Rail	D Line Extension from VA to Ocean Avenue	Extension of the D Line from end of Section 3 to Ocean Avenue in Santa Monica.	Draft Initial Project List	Cannot be done by 2028
Rail	Division 20 Portal Widening and Turnback Facility	Build a new turnback facility and readjust rail storage tracks to support the D Line extension and frequencies.	Draft Initial Project List	
Rail	Elevator and Escalator Improvements	Improve elevator and escalator operations without down time through improved monitoring and repair implementation of systems reaching failure modes prior to scheduled manufacturer recommended maintenance and replacements.	Draft Initial Project List	
Rail	Expo Park-Watt Way Roadway	Close off Watt Way across tracks and convert Watt Way entrance to right-in/right-out to eliminate vehicle movement across tracks.	Draft Initial Project List	Bundled

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Rail	Expo/Crenshaw Transfer Station Improvements	Portal entrance on southwest side of Expo/Crenshaw Station and other improvements to better facilitate transfers between both lines. Walking and biking infrastructure improvements derived from Metro Board-adopted FLM Plan.	Draft Initial Project List	
Rail	Frequent Train Interior Cleaning	More routine cleaning of Metro rail vehicles with high ridership to improve cleanliness.	Draft Initial Project List	
Rail	Hawthorne/Lennox Station Improvements	Station amenities and widen sidewalks to improve queuing and station access from buses.	Draft Initial Project List	
Rail	Memorial Park Station Improvements	Station amenities and improvements. Close off Holly Street at Arroyo Parkway in front of station.	Draft Initial Project List	
Rail	Metro Red Line Segment Traction Power Substation and Auxiliary Power Replacements	Replace 25-year old station power distribution system (MCCs) such as lighting, escalator/elevator power, public communication systems power, fire alarm power and similar, and replace 30-year old high voltage traction power substations.	Draft Initial Project List	
Rail	New L Line Interlocks	Add two new interlocks between Lincoln/Cypress and Heritage Square, and Memorial Park and I-210.	Draft Initial Project List	Bundled
Rail	New Siding and Crossover between Degan and 7th Avenue	Adding a new siding on the Track 4 side between Degan Ave. and 7th Ave. with a single crossover on the east to accommodate a three-car train.	Draft Initial Project List	Bundled
Rail	Rail Communications Systems Upgrades	State of good repair across the system to upgrade communications systems for the rail lines such as CTS, fiber, and UPS.	Draft Initial Project List	
Rail	Transit Passenger Information System Upgrades	Upgrade the existing transit passenger information system for seamless integration between public address and visual messaging signs.	Draft Initial Project List	Renamed
Rail	Video Management System Upgrades	Upgrade the existing video management system for better support for CCTV cameras, intrusion detection systems and access control systems.	Draft Initial Project List	
Rail	12th Street/Flower Street Closure	Permanently close off 12th Street to east/west traffic and prohibit left turns coming from southbound Flower Street on to 12th Street eastbound across the ROW.	Draft Initial Project List	Bundled

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<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Rail	Arts District/6th Street Station	New Metro rail station to serve the Arts District, Boyle Heights, and surrounding communities.	Draft Initial Project List	
Rail	Blue Light Call Boxes and Help Points	Add universal blue light call boxes at all rail platforms for passengers to summon police/fire/EMS. Upgrade existing emergency, passenger and gate telephones to Metro blue light help points.	Draft Initial Project List	
Rail	Centinela Grade Separation Project	Convert the at-grade crossing at Centinela and Florence to an above-grade crossing along the K Line.	Draft Initial Project List	
Rail	Downtown Long Beach Platform Optimization	Use 1st Street station as drop-off only, Downtown Long Beach Station as pick-up only during the games.	Draft Initial Project List	Converted to recommendation
Rail	E Line Expo Park/Vermont/ USC Station Improvements	Extend trench past Vermont; consolidate Vermont and USC stations to a single large multi-train center platform station with entrances at both ends. Construct pedestrian overpass or underpass to access station and/or cross over ROW.	Draft Initial Project List	
Rail	Fire Alarm Upgrades	Replace fire alarm system for rail lines.	Draft Initial Project List	
Rail	Foothill Gold Line Extension Phase 2B (Montclair)	Extension of the L Line beyond Pomona to Claremont and Montclair.	Draft Initial Project List	
Rail	I-210 Barrier Replacement	Safety improvements by increasing the barrier height between the L Line and I-210 freeway for Phases 1 and 2.	Draft Initial Project List	
Rail	L Line System and Reliability Upgrades	Replacement and upgrade of 20-year old OCS weight poles, air brake system, fire alarm system, and communications (CTS, fiber, UPS) systems along the Pasadena segment of the L Line.	Draft Initial Project List	
Rail	North Hollywood Maintenance-of-Way Access	Provide maintenance-of-way high-rail access ramp at North Hollywood Station.	Draft Initial Project List	
Rail	Platform Screen Doors (PSD) or Platform Edge Doors (PED)	Separate the platform from the tracks with PSD or PED at key stations to support the games.	Draft Initial Project List	
Rail	Radio Stations UPS Upgrade	Upgrade UPS systems to power all radio equipment for four hours as per MRDC.	Draft Initial Project List	
Rail	Rail Line Fencing	Reinforce and improve right-of-way fencing along at-grade rail lines for safety purposes.	Draft Initial Project List	

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Rail	Safety Intrusion Detection Systems	A physical layer track level intrusion detection system to detect objects or people on the track and unauthorized areas.	Draft Initial Project List	
Rail	Station Emergency Coordination	Provide station maps for first responders via smartphone scan.	Draft Initial Project List	
Rail	Systemwide Emergency Tunnel Ventilation Fan and Damper Replacement	Replace existing emergency fans and dampers with new energy saving fans and dampers to enhance safety.	Draft Initial Project List	
Rail	Wilshire/Vermont Passenger Notification System	Create a passenger notification system of train arrivals, which is difficult given the split and stacked platform configuration at the Wilshire/Vermont station.	Draft Initial Project List	
Rail	DTLA Streetcar	The 3.8-mile route will run approximately 18 hours a day to connect rides with places like South Park, Financial District, Staples Center, and LA Live. The LA streetcar improves connections Downtown and to the regional transit network. LA Streetcar will be the most frequent streetcar service in the entire country, with 7-minute headways during peak hours and frequencies of 10 to 15 minutes during off-hours.	Agency	Cannot be done by 2028
Regional Rail	Antelope Valley Line Improvements	The Antelope Valley Line (AVL) Capacity and Service Improvement will improve service frequency and reliability along the 76.6-mile long corridor between Lancaster and downtown Los Angeles.	Draft Initial Project List	
Regional Rail	Link US Phase A	The Link US project proposes the integration of new run-through tracks on an elevated viaduct over the US-101 freeway to improve operational flexibility and expand capacity at Union Station.	Draft Initial Project List	Cannot be done by 2028
Regional Rail	Link US Phase B	The Link US project proposes the integration of new run-through tracks on an elevated viaduct over the US-101 freeway to improve operational flexibility and expand capacity at Union Station.	Draft Initial Project List	Cannot be done by 2028



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Regional Rail	Metrolink SCORE Program Phase 1	\$10 billion capital improvement program – grade crossing, station and signal improvements as well as track additions and work that accelerates progress toward Metrolink’s zero-emissions future.	Draft Initial Project List	
Regional Rail	Metrolink SCORE Program Phase 2	\$10 billion capital improvement program – grade crossing, station and signal improvements as well as track additions and work that accelerates progress toward Metrolink’s zero-emissions future.	Draft Initial Project List	Cannot be done by 2028
Regional Rail	Metrolink Strategic Satellite Intercept Parking Locations	Creation or enhancement of parking lot locations on the Metrolink System, such as: Angel Stadium and LA County Fairgrounds.	Draft Initial Project List	
Regional Rail	Brighton to Roxford Double Track	Project proposes adding a second mainline track along the Valley Subdivision, new and upgraded traffic and pedestrian crossings between Hollywood Way in Burbank and Roxford Street in Sylmar.	Draft Initial Project List	
Regional Rail	Doran Street Grade Separations	Replace at-grade railroad crossings at Doran Street and West Broadway/Brazil Street with above-grade crossings.	Draft Initial Project List	
Regional Rail	High Desert Corridor	High-speed rail service between the California High-Speed Rail project in the Antelope Valley to the Brightline project in Victorville.	Draft Initial Project List	Cannot be done by 2028
Regional Rail	Lone Hill to White Double Track	Second mainline track along a 4-mile segment between Lone Hill Avenue in San Dimas and White Avenue in La Verne along the San Gabriel Subdivision.	Draft Initial Project List	
Regional Rail	Metrolink Downtown Burbank and Burbank Airport Stations Improvements	Network integration and station enhancements at these key transfer stations to support increased passengers at Burbank Airport.	Draft Initial Project List	
Regional Rail	Metrolink Norwalk/Santa Fe Springs Station Improvements	Modifying current station so that it has a center platform and track slot capacity allowing more trains along corridor and other station improvements for increased passenger demand.	Draft Initial Project List	
Regional Rail	Metrolink Passenger Information System Upgrade	Ensure the ability to effectively inform Games travelers using Metrolink.	Draft Initial Project List	

**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Regional Rail	Metrolink River Park Station	New Metrolink station at G2 Park/Taylor Yard serving the Cypress Park, Glassell Park, and Elysian Valley communities.	Draft Initial Project List	
Regional Rail	Metrolink Van Nuys Station Improvements	Network integration and station enhancements at these key transfer stations to support increased passengers at this location.	Draft Initial Project List	
Regional Rail	Rehabilitation of Metrolink Train Sets/Locomotives	Rehabilitation of Metrolink equipment as spare in order for Metrolink to maximize use of existing equipment.	Draft Initial Project List	
Regional Rail	Rosecrans/Marquardt Grade Separation	Project proposes to convert the at-grade railroad crossing at Rosecrans and Marquardt Avenues in Santa Fe Springs to an above-grade crossing.	Draft Initial Project List	
Regional Rail	Vehicle Wayfinding	Install improved wayfinding on Metro bus and train vehicles, such as ground wayfinding in the event of crush loading during peak periods.	Draft Initial Project List	Bundled
Regional Rail	Expanded Regional Rail Fleet for 2028	Additional passenger cars and trainsets to accommodate increased demand and to offer bidirectional half-hourly service on most of the core Metrolink network, and hourly on key connecting segments.	Agency	Cannot be done by 2028
Regional Rail	Supporting Facilities for Fleet Expansion	Upgrade and expansion of fleet layover and maintenance facilities to support an expanded and cleaner fleet	Agency	Cannot be done by 2028
Regional Rail	Line Capacity Improvements on the San Bernardino Line	Additional double track and supporting improvements on the San Bernardino Line to accommodate half-hourly service on the corridor. In addition to Downtown LA venues, serves venues at Bonelli Park	Agency	
Regional Rail	Line Capacity Improvements on the Metrolink 91/Perris Valley Line	Additional double track and supporting improvements on 91/Perris Valley Line to accommodate half-hourly service on the corridor at least between Riverside and Perris-South. In addition to Downtown LA venues, serves venues in or near Perris	Agency	

**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Regional Rail	Additional Passenger Capacity on BNSF San Bernardino Subdivision (OC, 91/PV, and IEOC Lines)	Investment in additional passenger track capacity (e.g. segments of 3rd or 4th track) between LA, Orange, and Riverside counties on the BNSF San Bernardino Subdivision to support half-hourly service on the OC, 91/PV, and IEOC Lines. Includes the relocation of Commerce Station to optimize freight and passenger train flow. Serves the Rowing Venue at Lake Perris	Agency	
Regional Rail	"VC Line Capacity Improvement (Ventura to Moorpark)"	Investment on UP Santa Barbara Subdivision to support increased service from the City of Ventura (up to hourly)	Agency	
Regional Rail	Pomona Fairplex Station Upgrade	Upgrades and addition of a platform face for more robust circulation to and from the Pomona Fairplex, reconfiguration of parking facility for parking, regional bus shuttles, venue buses to Bonelli Park	Agency	
Systemwide	Big Data Procurement	Purchase big data (such as cellphone movement data) and license to share and use within Metro and by partner agencies to understand real-time travel patterns.	Draft Initial Project List	
Systemwide	"Cybersecurity and Data Security"	Securing of sensitivity data to and from Metro systems to prevent disruptions.	Draft Initial Project List	
Systemwide	Emergency Security Operations Center (Center Street Project)	Facility in the Arts District that will provide a central location for Metro's security operations, dispatch and emergency coordination.	Draft Initial Project List	
Systemwide	Increased Rail/Bus Service	Increased rail/bus service on targeted routes impacted by Games travelers.	Draft Initial Project List	Converted to recommendation
Systemwide	Metro Clean Program	Increased capacity (staffing/equipment) for additional pressure washing of rail platforms, bus stations, bus stops focused on stations near Games.	Draft Initial Project List	
Systemwide	Metro Rail/BRT/Bus Mobile Wayfinding Application	Facilities navigation application for customers with disabilities and other customers. Digital beacon/phone technology that provides audio read outs for passengers who are blind/low vision.	Draft Initial Project List	
Systemwide	Metro Rail and BRT Stations Improvements	Providing required maintenance upgrades to Metro Rail and BRT Stations near Games venues, transfer, and terminals that are at least a decade old.	Draft Initial Project List	

**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Systemwide	Metro Rail/BRT ADA Tactile Guidance Systems	Tactile guidance system for customers with blindness/visual impairments and other customers with disabilities.	Draft Initial Project List	Bundled
Systemwide	Mobility Wallet Development	Implementation of mobility wallet in TAPforce which allows users to pay for multiple public and private mobility services.	Draft Initial Project List	Renamed
Systemwide	Systemwide ADA Accessibility Improvements	Upgrade system accessibility elements as needed to meet current California Title 24 accessibility/MRDC.	Draft Initial Project List	Bundled
Systemwide	TDM Integration with Transit APP	Integration of TDM programs and Park & Ride into Transit APP.	Draft Initial Project List	Bundled
Systemwide	Transit Integrated Network Study	Study best approach to establishing transit network with Metro, Metrolink, and local municipal operators and games events.	Draft Initial Project List	
Systemwide	Universal Fare Integration	Improvements to fare integration technology to enable single source of payment among all municipal transit providers and shared mobility companies.	Draft Initial Project List	
Systemwide	ATMS2 Upgrade	Upgrade CAD/AVL system to improve, service quality, safety, and security.	Draft Initial Project List	
Systemwide	Data Management & Analytics	Secure, integrate new transportation data sets to support improve management of transportation to and from Games venues.	Draft Initial Project List	
Systemwide	HASTUS Upgrade	Upgrade HASTUS software to allow automated scheduling of single track, EV buses, deviations, restricting fallbacks, and managing delays.	Draft Initial Project List	
Systemwide	Multilingual Blue Shirts/ Ambassadors Expansion Program	Expansion of multilingual blue shirts/ ambassador staffing to assist Games travelers who are unfamiliar with the system.	Draft Initial Project List	
Systemwide	Open Loop Payment	Replace card scanners/readers with ones that are open loop in that they can accept payment from credit cards, debit cards, payment apps etc.	Draft Initial Project List	Bundled
Systemwide	Regional Special Event Data Exchange and Distribution (ATIS)	Implementation of a regional event management system to collect and distribute data/information.	Draft Initial Project List	
Systemwide	Rider Alert System	SMS text-based system that allows riders to subscribe for alerts on particular lines.	Draft Initial Project List	

**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Systemwide	Station Restrooms	Add restrooms at key stations near Games venues.	Draft Initial Project List	
Systemwide	Elevator Attendant Program	Attendants at select elevators in the Metro system to keep them clean and safe for seniors, people with disabilities and travelers with luggage.	Draft Initial Project List	
Systemwide	Temporary Systemwide Signage	Temporary signage and printed info at key bus stops and rail stations - welcome signs in multiple languages, wayfinding guidance to Games venues and lodging, etc.	Draft Initial Project List	
Systemwide	Ticketing Integration	TAP enhancements to integrate with the Games ticketing process for travel choices.	Draft Initial Project List	Bundled
Systemwide	Urban Ecosystem (Street Tree Replacement)	Increase LA's tree canopy in areas of greatest need by at least 50% by 2028.	Agency	
Systemwide	Essential Worker Assessment and Support Needs during Games	Assessment of LA County (and neighboring) populations that need to continue driving during the games due to the nature of their work as essential and/or vehicle based. Recommend strategies of supporting populations to ensure awareness of venue locations, avoidance, retiming of trips, continued transit service, etc.	Agency	
Systemwide	Asset Management Program	Account for needed investment in ensuring new (and existing) assets are documented and maintained over their lifespan.	Agency	
Systemwide	Digital Infrastructure	Digital tools to make infrastructure more dynamic.	Agency	
Systemwide	Gender Action Plan	Bundled together all GAP projects and strategies	Task Force	Bundled
Systemwide	Transportation Center of Excellence	Establish bus and rail car manufacturing in the county along with an innovation hub, proving ground, and testing center.	Task Force	

**ATTACHMENT C – Comprehensive MCP Project List**

<b>MODE/TYPE</b>	<b>PROJECT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGIN</b>	<b>COMMENTS</b>
Systemwide	Local Access Games Route Network	A network of temporary dedicated-lanes that serve active transportation users who are accessing Olympic venues, within the 1/4 mile radius of 10 venues: Long Beach Pier; Dignity Park; Sepulveda Basin, UCLA; LA Live; Grand Park; Dedeaux Field; USC; The Forum; and Downtown Long Beach. Dedicated lanes would allow for "Conversation Lanes" for bike riders, and would act as shared use pathways within the roadway for active transportation users.	Task Force	
Systemwide	Connections with airline passengers and air travel	Provide land side transit information to airline passengers as well as potentially offer promotions to airline ticket holders to travel by transit.	Task Force	
Systemwide	Customer feedback and reporting	Create systems for riders to deliver feedback easily, specifically developing a system to get customer feedback directly through the Transit app	Task Force	
Systemwide	Public Arts Program - Special Events and Appearances	Provide public art on and near transit stops and on transit vehicles to surprise and delight riders. Plan events and appearances from celebrities and athletes on and near transit as a way of creating special moments for tourists and locals to engage with LA culture and engage with alternative transportation options.	Task Force	
Systemwide	Transportation Communication Network Expansion	Expand TCN to rest of LA County	Task Force	
Systemwide	Universal Basic Mobility Expansion	Bring transit, e-bikes, shared electric vehicle (EV) cars and on-demand EV shuttle service using a mobility wallet that subsidizes transit fares for 2,000 pilot area residents who have historically lacked options for how to get to where they need to go safely.	Task Force	

# EXHIBIT L

Exhibit L is related to Comment GO14-64. This Exhibit material was considered in the Response to Comment GO14-64.



# Motion 42 Update: 2022 Prioritized MCP Project List



**Metro**

*November 16, 2022*



## BACKGROUND – Motion 42

- Per Motion 42, develop a prioritized project list that helps to achieve the following:
  - Leaves a permanent legacy after the 2028 Games
  - Enables all spectators and workforce to get to the 2028 Games by public transit, walking, or rolling
  - Ensures accessibility for all
  - Creates an effective coalition of partners



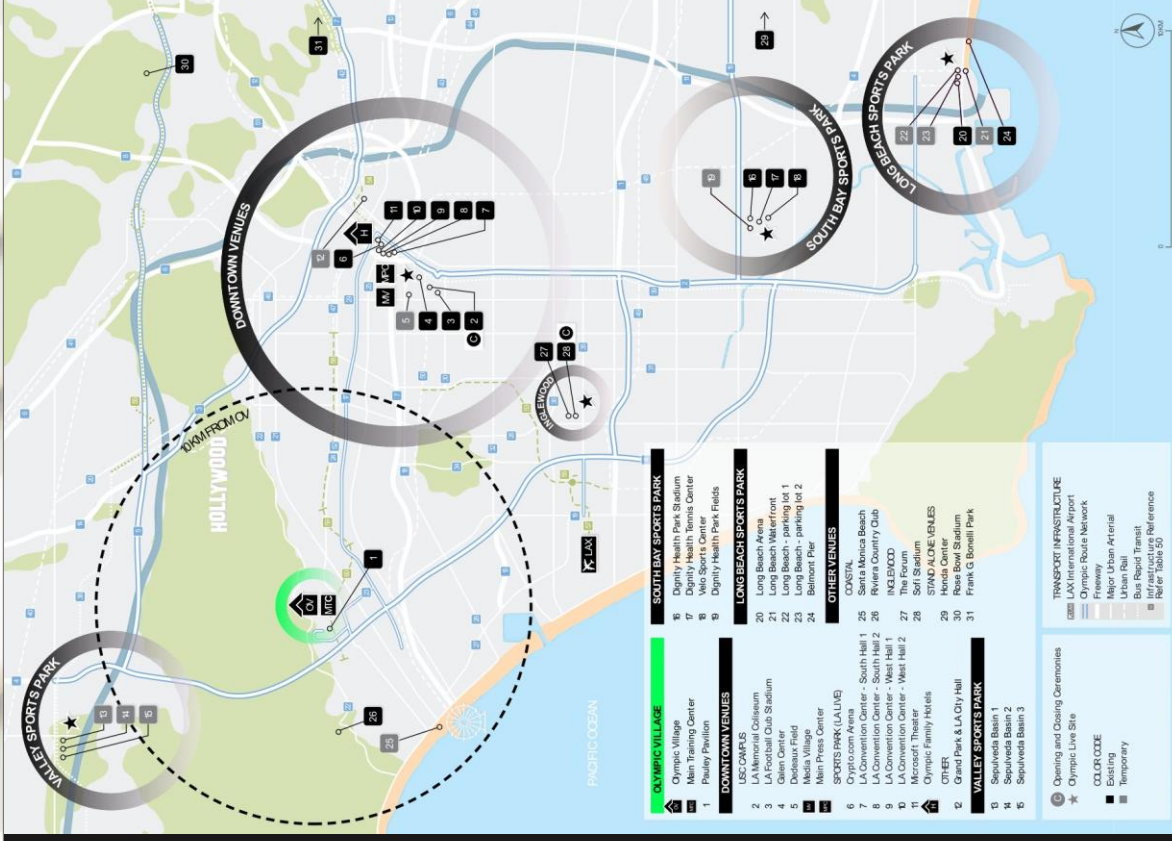
**Metro**

# BACKGROUND – 2028 Games

- Multiple sports parks across LA County
- Anticipate 10 to 15 million tickets across 800+ events
- Likely the largest sports event in US history
- Mobility considerations during the Games:
  - **Games Route Network:** Dedicated lanes for Games vehicles between venues
  - **No venue parking:** All spectators will need to arrive to the venues using public transportation
  - **Supplemental spectator system:** Temporary bus system to meet spectator demand during the Games



**Metro**



## BACKGROUND – Games Mobility Executives

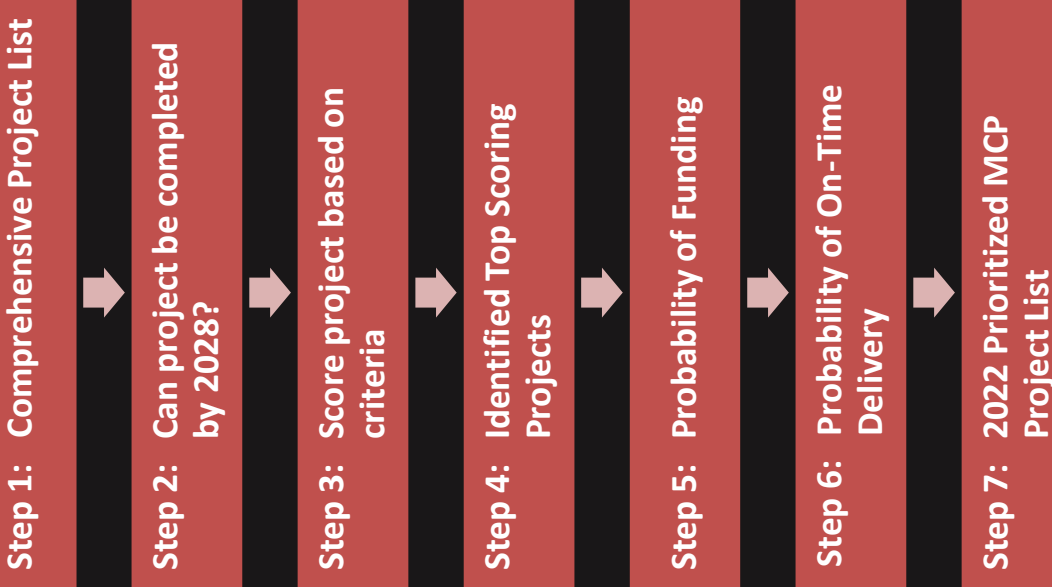
- Pursuant to the host city contract, LA28 (organizing committee for the 2028 Games) will convene the Games Mobility Executives (GME) to plan mobility for the 2028 Games and includes the following:
  - LA28
  - Metro
  - Caltrans
  - Metrolink
  - LADOT
  - City of LA Mayor’s Office
- GME to endorse projects to jointly seeking funding

### **METRO’S ROLE**

- Metro is the lead mobility partner in planning and delivery of mobility services during the Games
- Metro is the aggregator of the project list through the Mobility Concept Plan

# Prioritization Process

- Finalized seven-step prioritization methodology
- Comprehensive Project List based on:
  - Draft Initial Project List presented to the Board in January 2022
  - Input from agencies and key stakeholders
  - Technical analysis and needs assessment
- Criteria used for scoring:
  - Provides legacy and permanent benefits after the Games
  - Provides significant value during the Games
  - Serves the needs of and enhances quality of life for disadvantaged communities



**Metro**

## Prioritization Process

- **Probability of Funding**
  - **Priorities:** Does it align with federal and state priorities (disadvantaged communities, climate resiliency, safety, partnerships)?
  - **Local:** Is it consistent with local plans/policies?
  - **Funding:** What is the funding gap and what are potential funding sources?
- **Probability of On-Time Delivery**
  - **Funding:** Is funding in place and can new funding be secured?
  - **Status:** How far along is the project?
  - **Duration:** How long will it take to deliver?
  - **Difficulty:** What is the technical degree of difficulty?



## Benchmarking Other World Games

- Each Games varied widely in terms of size, scope, and location, thus making it difficult to make comparisons
- DOT allowed deferral of local match requirement to receive the entire available federal share before spending any local funds
- Majority of federal funding received went towards transportation infrastructure
- DOT temporarily waived some federal requirements to build rapid transit system

Games Hosted in US Cities	Transportation Investments		Federal Share	
	Costs (in 2022 \$)	# of Projects	Funding (in 2022 \$)	Cost Share %
Salt Lake City 2002 Winter Games	\$4B	40	\$1.9B	49%
Atlanta 1996 Summer Games	\$2B	35	\$0.8B	41%

Recent Games	Transportation Investments (in 2022 \$)
London 2012 Summer Games	\$7.5B
Rio 2016 Summer Games	\$10.5B



## 2022 Prioritized MCP Project List

- Screened unfunded and partially funded projects based on top scoring projects
- Prioritized projects based on:
  - 60% Criteria Score
  - 40% Probability of On-Time Delivery & Funding
- 2022 Prioritized MCP Project List is a living list and will be updated regularly
- Also identified projects in construction or fully funded projects already on track to be delivered by 2028

### 2022 Prioritized MCP Project List

**50** projects

**\$10.9B** total cost

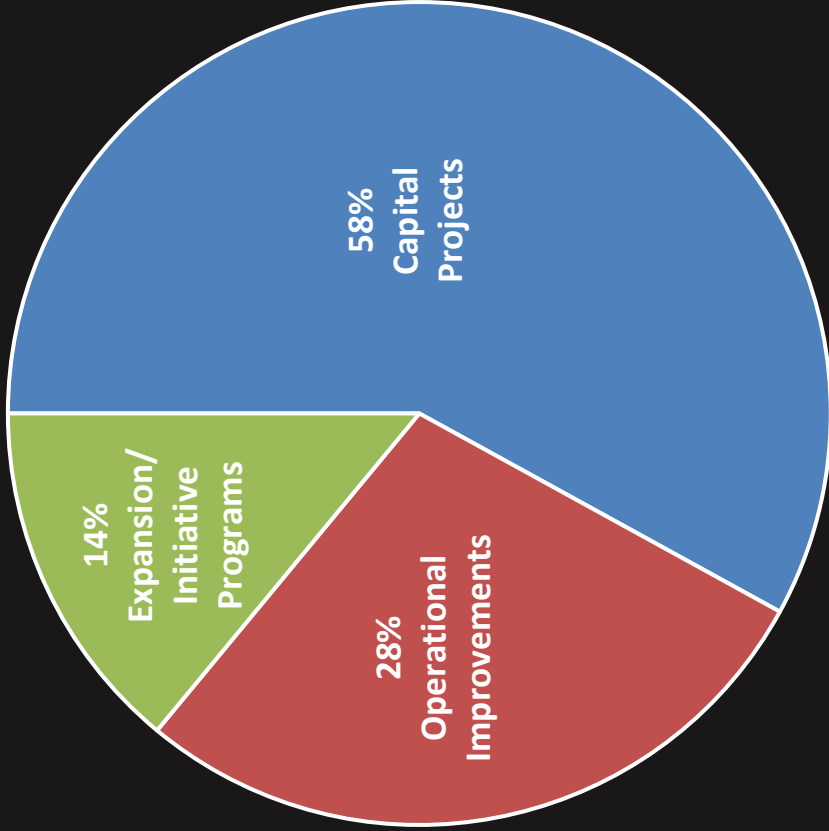
**\$9.7B** funding gap



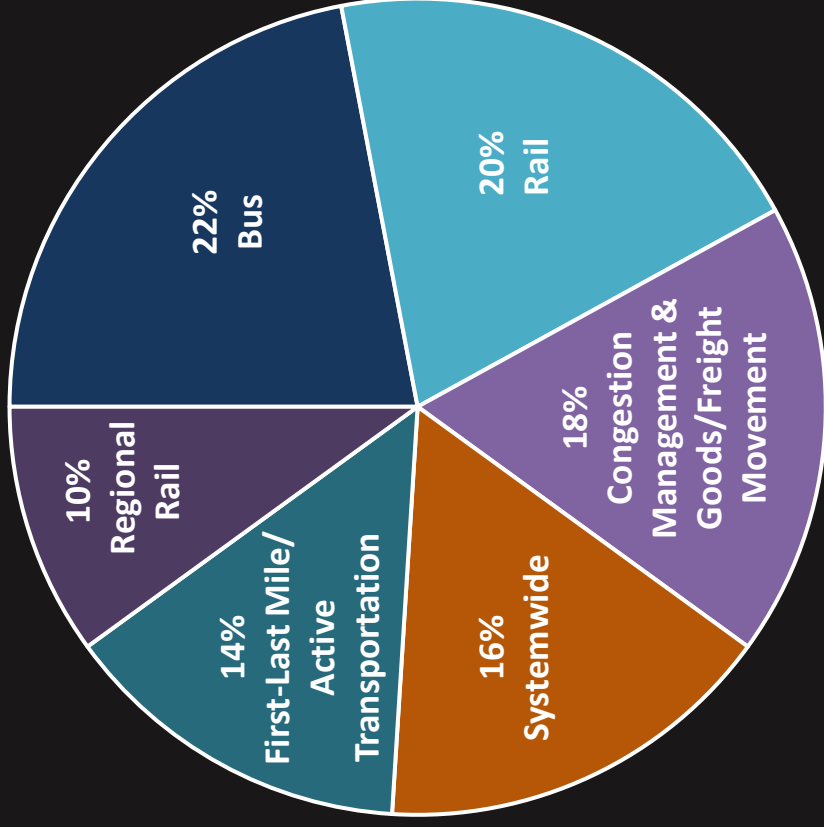
**Metro**

# 2022 Prioritized MCP Project List

Project Type



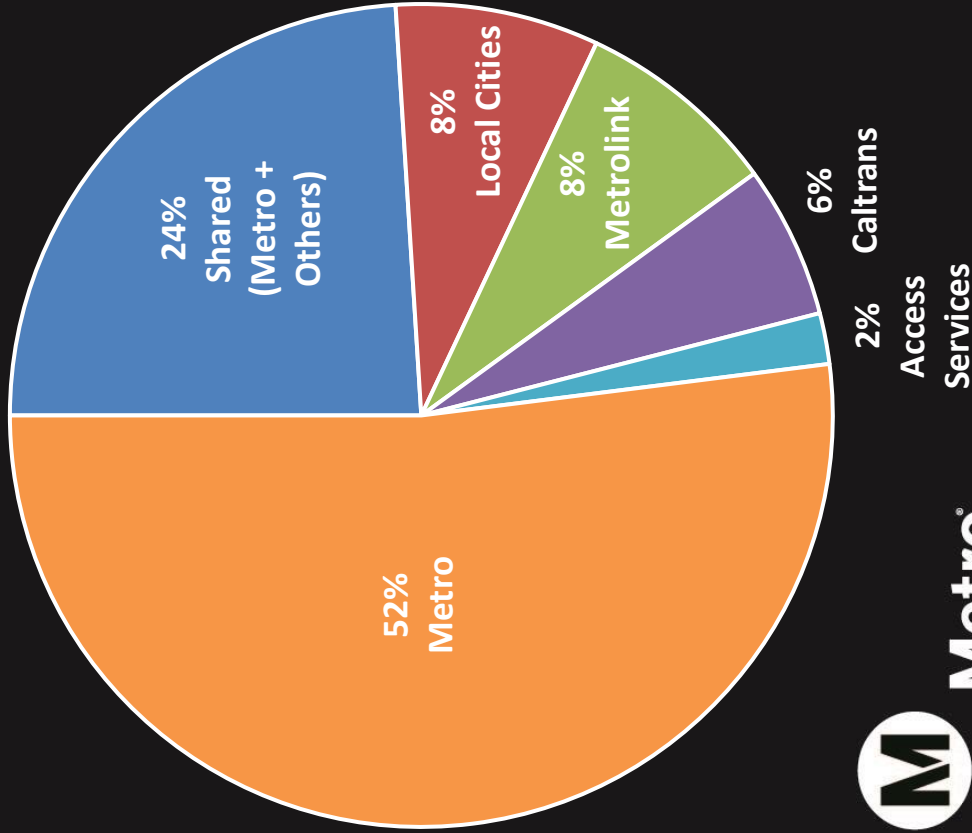
Mode/Type





# 2022 Prioritized MCP Project List

## Lead Agency



**Metro**

## Equity Considerations

**90%** of LA County venues are within or near EFCs

**92%** of projects are located within EFCs

**\$320M** specifically allocated for accessibility improvements



# 2022 Prioritized MCP Project List (Page 1 of 2)

Mode	Project Name	ROM Cost	Funding Gap
Bus	Access Services EV Fleet & Charging Infrastructure	\$40,000,000	\$40,000,000
Bus	Atlantic Blvd Bus Only Lanes & TSP (NextGen Improvements)	\$150,000,000	\$150,000,000
Bus	Broadway Bus Only Lanes & TSP (NextGen Improvements)	\$250,000,000	\$250,000,000
Bus	Bus Terminal and Layover Improvements	\$175,000,000	\$175,000,000
Bus	Camera Bus Lane Enforcement	\$20,000,000	\$20,000,000
Bus	GRN Bus Only Lanes & TSP (NextGen Improvements)	\$600,000,000	\$600,000,000
Bus	Local Municipal Operators Call for Projects	\$65,000,000	\$65,000,000
Bus	Sports Park Metro Zero Emission Bus Fleet	\$275,000,000	\$275,000,000
Bus	Supplemental Bus System	\$500,000,000	\$500,000,000
Bus	Venice Blvd Bus Only Lanes & TSP (NextGen Improvements)	\$150,000,000	\$150,000,000
Bus	Vermont BRT	\$425,000,000	\$45,000,000
CM-GFM	Arterial Network Traffic Signal Analytics	\$20,000,000	\$20,000,000
CM-GFM	ATSAC/LARTMC Integration and Operations Enhancements	\$15,000,000	\$15,000,000
CM-GFM	Countywide TDM Campaign	\$60,000,000	\$60,000,000
CM-GFM	Freight TDM	\$25,000,000	\$25,000,000
CM-GFM	GRN Design and Implementation	\$85,000,000*	\$85,000,000
CM-GFM	I-10 Santa Monica Freeway ICM Project	\$9,000,000	\$9,000,000
CM-GFM	I-405 ICM Project	\$57,000,000	\$47,000,000
CM-GFM	I-710 ICM Project	\$35,000,000	\$35,000,000
CM-GFM	Centinela Grade Separation Project	\$225,000,000	\$75,000,000
FLM-AT	Inglewood Transit Connector	\$1,400,000,000	\$1,035,000,000
FLM-AT	LA River Path	\$525,000,000	\$210,000,000
FLM-AT	Los Angeles Universities Mobility Hubs	\$30,000,000	\$30,000,000
FLM-AT	Metro Micro Expansion	\$30,000,000	\$30,000,000
FLM-AT	Open Streets to Uplift Arts, Culture, and Recreation	\$10,000,000	\$10,000,000

# 2022 Prioritized MCP Project List (Page 2 of 2)

Mode	Project Name	ROM Cost	Funding Gap
FLM-AT	Rail and Bus Games Mobility Hubs	\$100,000,000	\$100,000,000
FLM-AT	Transit to Venue Ped/Bike Access Enhancements	\$75,000,000	\$75,000,000
Rail	7th/Metro Center Station Upgrades	\$25,000,000	\$25,000,000
Rail	Arcadia Power Substation Upgrade	\$20,000,000	\$20,000,000
Rail	C/K Lines Station Platform Extensions & Reliability Upgrades	\$250,000,000	\$250,000,000
Rail	Elevator and Escalator Improvements	\$55,000,000	\$55,000,000
Rail	Foothill Gold Line Extension Phase 2B (Montclair)	\$120,000,000	\$120,000,000
Rail	L Line (Pasadena) System and Reliability Upgrades	\$85,000,000	\$85,000,000
Rail	Light Rail Speed & Operational Improvements	\$300,000,000	\$300,000,000
Rail	Pico Station Improvements	\$40,000,000	\$40,000,000
Rail	Union Station Improvements	\$25,000,000	\$25,000,000
Rail	Washington Wye/Flower St Operational Improvements	\$150,000,000	\$150,000,000
RR	Lone Hill Ave to White Ave Double Track (SBL)	\$135,000,000	\$125,000,000
RR	Regional Rail Park and Ride Facilities	\$35,000,000	\$35,000,000
RR	SCORE (Package 1: Fleet and Additional Track Capacity)	\$1,560,000,000	\$1,560,000,000
RR	Supplemental Games Readiness Network Improvements (Package 2)	\$540,000,000	\$540,000,000
RR	Supplemental Games Readiness Network Improvements (Package 3)	\$1,210,000,000	\$1,210,000,000
SYS	Customer Information System Integration/Technology	\$9,000,000	\$9,000,000
SYS	Cybersecurity and Data Security	\$75,000,000	\$75,000,000
SYS	Emergency Security Operations Center	\$230,000,000	\$146,000,000
SYS	Games Sports Park Stations SOGR Improvements	\$500,000,000	\$500,000,000
SYS	Metro Clean Program	\$50,000,000	\$50,000,000
SYS	Multilingual Blue Shirts/ Ambassadors Expansion Program	\$5,000,000	\$5,000,000
SYS	Universal Basic Mobility Expansion	\$40,000,000	\$40,000,000
SYS	Universal Fare and Ticketing Integration	\$30,000,000	\$30,000,000



# Funded/Construction Projects To Be Completed by 2028

Mode	Project Name	Estimated ROM Cost	Completion Year
Bus	G Line Improvements	\$380,000,000	2026-2027
Bus	J Line Electrification	\$125,000,000	2024-2026
Bus	NoHo to Pasadena BRT	\$335,000,000	2028
Bus	North SFV BRT	\$225,000,000	2024-2025
CM-GFM	I-105 ExpressLanes (Segment 1)	\$250,000,000	2026
CM-GFM	I-105 Integrated Corridor Management (ICM) project	\$25,000,000	2026-2027
CM-GFM	I-5 North County Enhancements	\$702,000,000	2026-2027
CM-GFM	I-605 Hot Spots Projects	\$74,500,000	2026-2028
CM-GFM	Socal 511 Regional Trip Planning	\$700,000	2023
CM-GFM	SR-57/SR-60 Interchange Improvements	\$750,000,000	2028
CM-GFM	SR-91 Improvements	\$70,000,000	2026-2028
FLM-AT	Eastside Access Improvements	\$35,000,000	2023
FLM-AT	LA Union Station Forecourt and Esplanade Improvements	\$35,000,000	2026-2028
FLM-AT	Metro Active Transportation (MAT) Approved Projects	\$66,500,000	2028
FLM-AT	Rail to Rail ATC Segment A	\$140,000,000	2024-2025
Rail	Airport Metro Connector	\$924,000,000	2024-2025
Rail	Division 20 Portal Widening and Turnback Facility	\$938,500,000	2024-2025
Rail	Foothill Gold Line Extension Phase 2B (Pomona)	\$877,500,000	2025
Rail	Regional Connector	\$1,773,000,000	2023
Rail	Westside Purple Line Extension Section 1	\$3,129,000,000	2024
Rail	Westside Purple Line Extension Section 2	\$2,470,000,000	2025
Rail	Westside Purple Line Extension Section 3	\$3,224,000,000	2027
RR	Antelope Valley Line Improvements	\$235,000,000	2028
RR	Rosecrans/Marquardt Avenue Grade Separation	\$175,000,000	2025

## Next Steps

- **2022 Prioritized MCP Project List**
  - Submit Board approved project list to the Games Mobility Executives (GME)
  - GME to review list and determine which projects to jointly seek funding
  - Metro will seek funding for projects not selected for GME advocacy separately

# EXHIBIT M

Exhibit M is related to Comment GO14-85. This Exhibit material was considered in the Response to Comment GO14-85.

google.com

Restaurants Coffee Groceries



Dodger Stadium

Los Angeles Union Station, 800 N Alameda

Add destination

Options

Send directions to your phone

	via Sunset Blvd and W Cesar Estrada Chavez Ave	35 min	1.8 miles
<a href="#">Details</a>			
	via N Alameda St	37 min	1.8 miles

All routes are mostly flat

Map data ©2023 Google United States Terms Privacy Send feedback 1000 ft

# EXHIBIT N

Exhibit N is related to Comment GO14-85. This Exhibit material was considered in the Response to Comment GO14-85.



google.com

Restaurants Coffee Groceries

Dodger Stadium

Chinatown Station, 1231 N Spring St, Los

Add destination

Options

Send directions to your phone

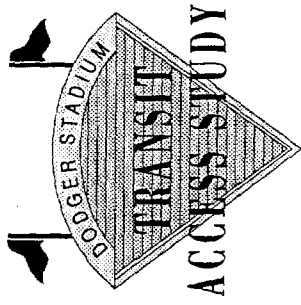
	via Lilac Terrace	25 min	1.2 miles
<a href="#">Details</a>			
	via Sunset Blvd and W College St	32 min	1.6 miles

All routes are mostly flat

Map data ©2023 Google United States Terms Privacy Send feedback 1000 ft

# EXHIBIT O

Exhibit O is related to Comment GO14-86. This Exhibit material was considered in the Response to Comment GO14-86.



PREPARED FOR THE:

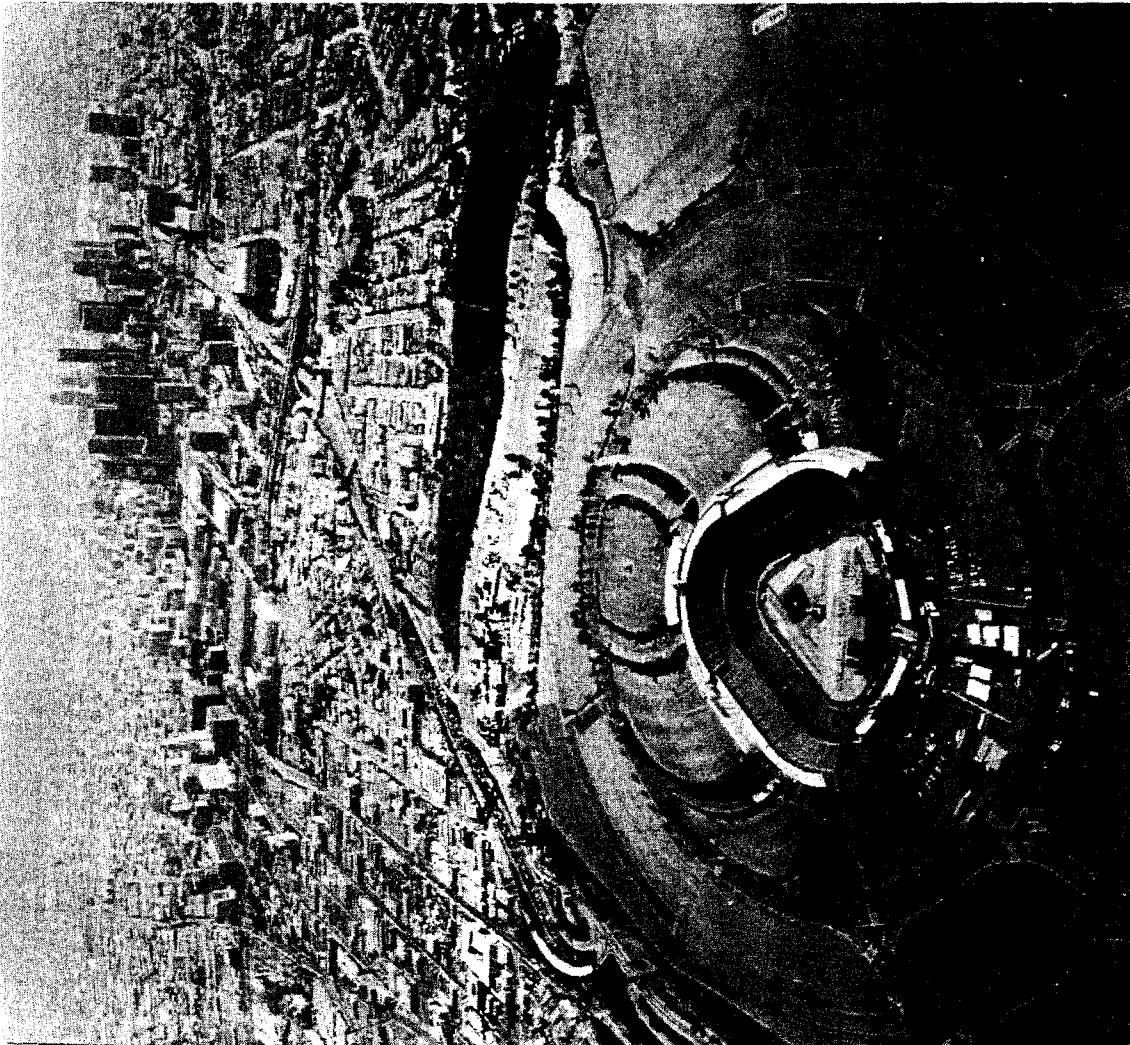
LOS ANGELES COUNTY  
TRANSPORTATION  
COMMISSION



PREPARED BY:

GRUEN ASSOCIATES

AUGUST 1990



# DODGER STADIUM ACCESS STUDY

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## SUMMARY

This report focuses on alternative connections that directly link Dodger Stadium and the planned Pasadena Line Rail Transit Station near the intersection of College and Spring Streets in Chinatown. Two key factors in the consideration of any such connection are: 1) steep grades surrounding the blufftop parking areas of Dodger Stadium and 2) the infrequent but high crowd peaking that occurs at major events.

Dodger Stadium is located on a bluff top that is elevated more than 200 feet above the Pasadena Rail Transit Line. Any connector option would need to be able to handle this steep grade. Secondly, before and after events at Dodger Stadium, large numbers of people entering and exiting the parking facilities cause congestion and delay for attendees. Any transit technology must accommodate a peak loading phenomenon where up to 56,000 persons enter or leave the Stadium within a brief period of time before or after events.

Because of these factors, the access study identified a selected group of representative route and technology alternatives that could function over a short (approximately one mile) route in which elevation changes of 225-275 feet are encountered.

The technologies examined include shuttle buses, automated guideway transit, light rail transit, gondola tramways, walkways and escalators. Furthermore, each of the connector alternatives was developed with the goal of supporting economic development potential in and around the future Chinatown Rail Transit Station.

As shown on Table 1, the connector alternatives with the greatest system capacities are the automated guideway transit (AGT) and light rail alternatives. These alternatives could provide a maximum capacity of 18,000 passengers per hour for an AGT system such as a six-car mono-rail train or 14,000 passengers/hour for a 3-car LRT train. This represents approximately 25-30% of a sold out event exiting Dodger Stadium. Total travel time to College Street Station would be 3 minutes for AGT and 7 minutes for LRT. Waiting time following events at Dodger Stadium could add up to 18 minutes to these travel times. Costs for a light AGT system are estimated at \$20-25 million. Costs for grade separated LRT are estimated at \$50-55 million.

A gondola tramway alternative offered the lowest capacity of the technologies considered. Systems similar to the Palm

Springs Aerial Tramway could carry up to 2,800 passengers/hour over the Dodger Stadium route. Travel time from Dodger Stadium to College Street Station would necessarily involve long waiting times during peak events due to the lower system capacities of gondola tramways. An average travel time following a Dodger game, including waiting time, would be well over one hour. Costs for a gondola tram system would be \$12-15 million.

Shuttle buses, running as an extension of RTD and DASH systems, could provide a peak event capacity of 7,200 passengers/hour, assuming 30 second headways. Travel time to College Street Station would be 10 minutes, although waiting time following events at Dodger Stadium could add up to 33 minutes to trip time. Capital costs would be minimal, as existing RTD buses could be dispatched from the Downtown Central Bus Facility for Dodger Stadium events which generally occur outside of rush hour periods.

Pedestrian improvements, including escalators from the blufftop parking lots of Dodger Stadium to an existing pedestrian overcrossing of the Pasadena Freeway, could be linked to the College Street Sta-

tion via pedestrian walkways. Capacities for a double-escalator, double-walkway configuration would be 16,000 persons/hour, or 29% of a sold out event at Dodger Stadium. The major advantage of this system is that there would be very little waiting for an escalator before or after an event, and walking time compares favorably with other technologies when waiting times are accounted for. Costs for this alternative would be \$2 to 5 million.

A more detailed description of the alternatives is provided beginning on page 7 of this document. A more detailed comparison of the alternatives is provided beginning on page 25.



**CAPACITY AND  
COST COMPARATIVE  
MATRIX**

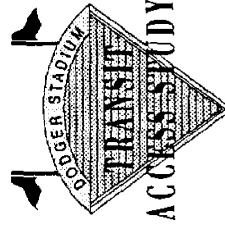


TABLE 1  
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Route	Dodger Stadium Mode/Assumptions	Peak Exiting Capacity persons/hour* (% of Dodger Stadium capacity)	Exiting, Boarding, & Travel Time to Pasadena Line**	Route Length* (1-way: Stadium to Mid-Station to Pasadena Line)	Order of Magnitude Costs	Notes
A	Shuttle Bus • DASH or RTD extension • 60 persons / bus • 30-second headway	7,200 / hour (13% of capacity)	43 minutes	A1 = 7,500' (1.4 miles) A2 = 8,500' (1.6 miles) A3 = 9,500' (1.8 miles)	minimal capital costs	Assumes use of RTD & DASH buses, personnel and maintenance facilities.
B	AGT Shuttle • grade separated • double guideway • 90-second headway • 6-car trains	18,000 / hour (32% of capacity)	17 minutes	B1 = 4,400' (.83 miles) B2 = 4,300' (.81 miles)	\$20-25*** million	B1 requires guideway construction to flatten grades at freeway crossing.
C	LRT Spur • grade separated • double guideway • 3-minute headway • 3-car trains	14,000 / hour (25% of capacity)	25 minutes	7,500' (1.4 miles)	\$50-55*** million	Some grading required to flatten grades along Stadium Way South.
D	Gondola Tram • 2 125-passenger cars	2,800 / hour (5% of capacity)	92 minutes	2,800' (.53 miles)	\$12-15 million	Roosevelt Island Aerial Tramway costs escalated from 1975 costs of \$6.25 million. The length of the Roosevelt Island tramway is 3,100 feet.
E	Escalator/Walkway	Escalator: 16,000 / hour (29% of capacity) Escalator + Stairway: 24,000 / hour (43% of capacity)	23 minutes	600' (escalator) 4,500' (.85 miles) (stadium to station)	\$2.5 million	Length of escalator is 600 feet with 200 feet of elevation gain.

\* See Chapter 2.0 for discussion of technology, capacity, and route length assumptions.

\*\* Total time to move more than 4,000 riders from Dodger Stadium to Pasadena Line following an event. (See Table 3, Section 3.2 for discussion of exiting, boarding and travel times.)

\*\*\* Costs are typical per mile costs for aerial guideway systems. Costs are not included for stations, rail maintenance and storage. Such capital costs should be considered order-of-magnitude costs for initial comparison of alternatives only. Further engineering and route refinement study is required for more detailed cost estimates.



1 A

**KEY**






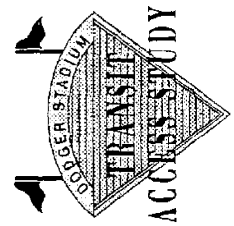
-  Elysian Park
-  Chinatown
-  LA Union Passenger Terminal
-  Downtown CBD
-  Dodger Stadium Parking Entrances

FIGURE 1



**LOCATION MAP**



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# 1.0 PURPOSE AND NEED FOR THE PROJECT

## 1.1 PROJECT BACKGROUND

Dodger Stadium is a nationally known 56,000 seat baseball and multi-function sports, concert and outdoor exhibition facility located in Chavez Ravine north of Downtown Los Angeles. The Stadium was opened in 1962, to provide a new home for the Los Angeles Dodgers baseball franchise, which had recently relocated to Los Angeles from New York and had been temporarily playing in the Los Angeles Memorial Coliseum at Exposition Park. Dodger Stadium plays host to at least 81 major league baseball games per year between April and October as well as numerous concerts and exposition events. Recent events, in addition to baseball, have included a rock concert by David Bowie, religious gatherings, and a Recreational Vehicle & Boat Show. Annual attendance for baseball is greater than 2 million spectators.

As shown in Figure 1, Dodger Stadium is located on a blufftop overlooking Downtown Los Angeles and is well served by highways (Pasadena, Hollywood and Golden State Freeways) and arterial roadways (Stadium Way, Academy Road). During events at the Stadium, the public is directed into parking lots at five different access points. Parking is provided for

upwards of 20,000 vehicles in parking lots surrounding the Stadium.<sup>1</sup> Additionally, charter bus parking is provided at a central location within the parking lot area.

<sup>1</sup> Estimate is based upon 175 acres of surface parking at 350 sq. ft./ vehicle.

KEY

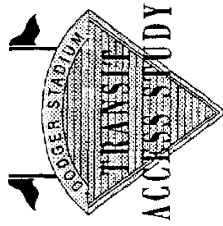
- Metro Red Line (opens 1993)
- Metro Blue Line (Long Beach segment opens 1990) (Pasadena segment opens 1998)
- - - DASH "Route B"
- RTD Route #635



FIGURE 2

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TRANSIT CONTEXT



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Transit service in the vicinity of Dodger Stadium is provided by SCRITD via surface bus routes in Chinatown and Elysian Park. As shown in Figure 2, this service is supplemented by DASH service (Downtown Area Shuttle) and three new rail transit projects scheduled for completion between 1990 and 1998.

Dodger Stadium is located one mile west of the adopted route of the Pasadena Light Rail Line. This project is scheduled for completion in 1998 with a station to be located in Chinatown, near the intersection of Spring Street and College Street. Since a Dodger Stadium Station was not possible along the Pasadena Line route, alternative means of connecting Dodger Stadium to the future Pasadena Line rail transit station have been analyzed in this report. In addition, the Metro Red Line, serving LA Union Passenger Terminal (LAUPT), Civic Center, 5th & Hill, 7th & Flower, and Wilshire & Alvarado is scheduled to open in 1993. Metro Blue Line service between Downtown Los Angeles and Downtown Long Beach opened for service in July 1990. RTD has recently commenced service on Line #635, which provides service between the Metro Blue Line Pico Station and Dodger Stadium. Direct connection by RTD buses is provided start-

ing 2 1/2 hours prior to each game and 15 minutes following the end of a game.

DASH service has been expanded in the downtown area with two routes. Route B presently runs along Hill Street and North Broadway in the vicinity of Dodger Stadium.

Providing transit access to persons attending events at Dodger Stadium will be the primary purpose of the Dodger Stadium Connector. The connector would ease traffic congestion before and after events at the Stadium and could attract additional attendance to these events by providing convenient access from Chinatown, downtown and the rest of the metropolitan region for those who cannot or do not wish to drive to the ballpark.

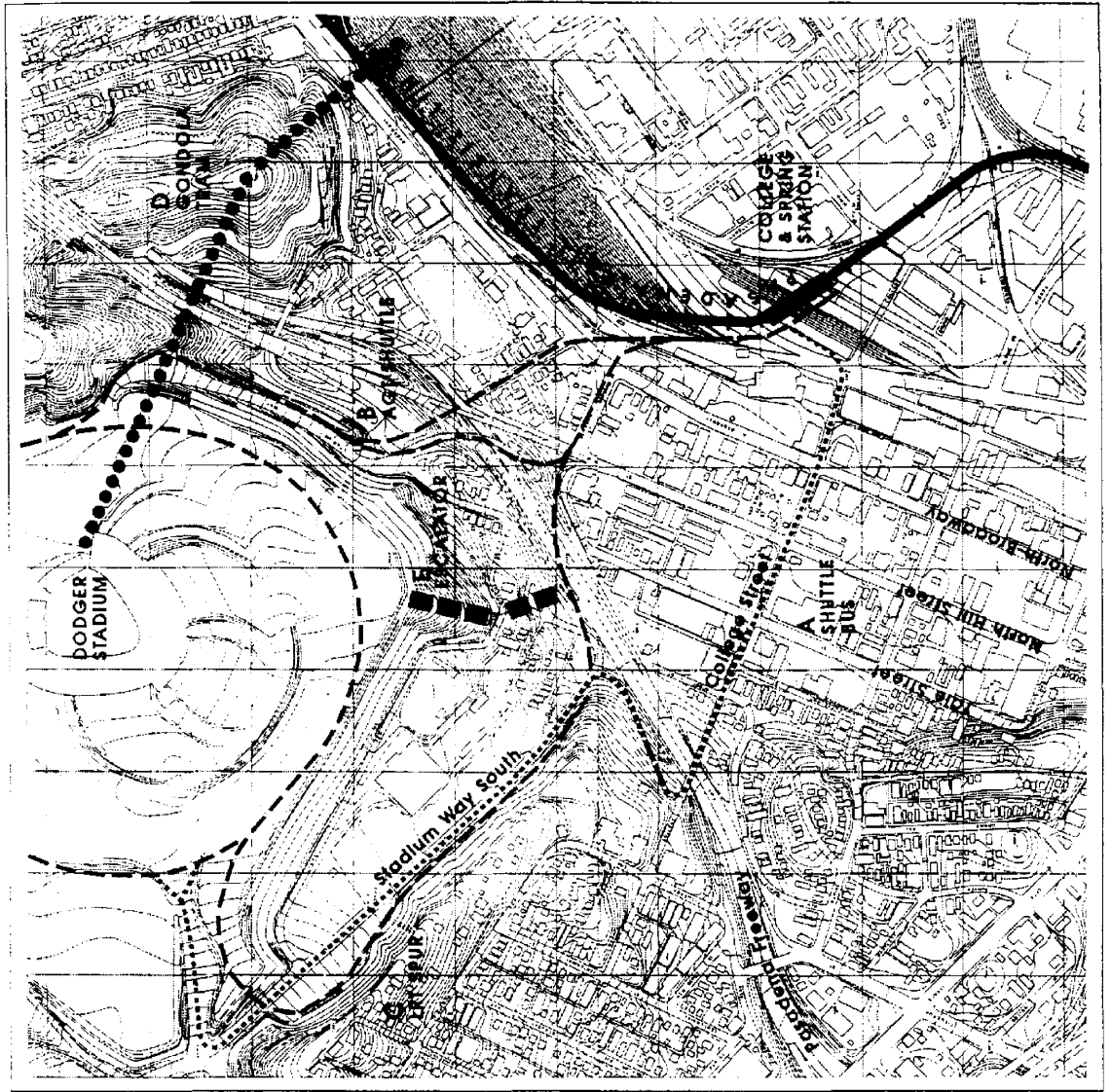
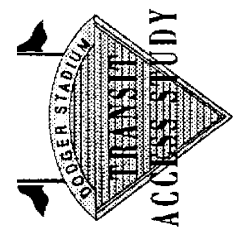


FIGURE 3

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**CONNECTOR  
ALTERNATIVES**



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## 1.2 PROJECT ALTERNATIVES

A major constraint to the provision of transit service to Dodger Stadium is the hilly terrain surrounding the Stadium blufftop location. Dodger Stadium is located between 200-300 feet above the surrounding urbanized areas, and any connector route would need to negotiate the steep slopes on the south and east faces of the blufftop parking area. Several alternative routes and technologies were examined to determine their ability to serve as transit connectors between the Dodger Stadium and the Pasadena Line. As shown in Figure 3, five generic profile and technology options were identified for study:

### Route A

Shuttle Bus Service: An at-grade bus shuttle that would provide service between the College & Spring Station and the loop road of the Dodger Stadium parking lots. Service would either be direct from downtown via DASH, or via the College & Spring Station where transit riders would change from LRT to shuttle buses.

### Route B

AGI Shuttle: An automated guideway transit shuttle that would provide service between the College & Spring Station and Dodger Stadium via either Bernard Street

or Cottage Home Street and Stadium Way East.

### Route C

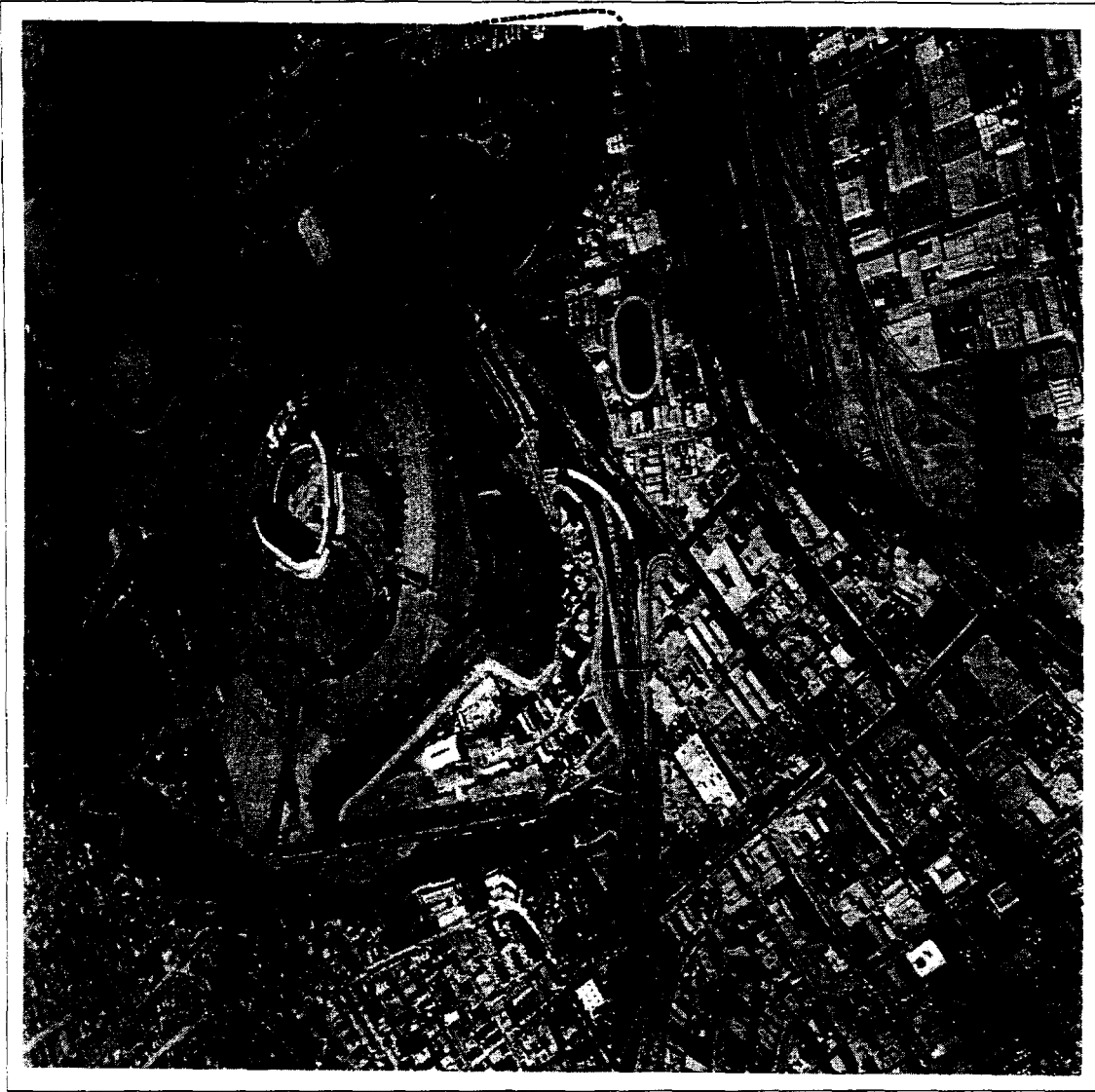
LRT Spur: An elevated spur track from the Pasadena Line that would allow LRT trains to be diverted from the Pasadena line in the vicinity of the College & Spring Station to provide service to a Dodger Station along Bernard Street and Stadium Way South.

### Route D

Gondola Tramway: Similar to the Palm Springs Aerial Tramway, this alternative would utilize an aerial cablecar system that would travel from the future Central City North Area, via Radio Tower Hill in Elysian Park, to Dodger Stadium. Such a transit mode would tend to serve as a visitor attraction in itself because of views of downtown Los Angeles, Dodger Stadium and Elysian Park.

### Route E

Escalator: A pedestrian connection from the College & Spring Station through Chinatown and above the Pasadena Freeway to an escalator and/or stairway that would provide vertical connection to the Dodger Stadium blufftop parking lots.

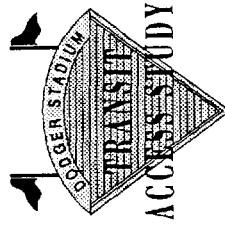


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FIGURE 4



ALTERNATIVE A  
SHUTTLE BUS



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## 2.0 ROUTE AND TECHNOLOGY ALTERNATIVES

### 2.1 ALTERNATIVE A SHUTTLE BUS CONNECTORS

Shuttle bus service is currently provided from downtown Los Angeles to North Broadway and Hill Streets near Dodger Stadium via LA Department of Transportation DASH buses. These buses run approximately every ten minutes (more frequently in the mid-day hours) from 6:30am to 6:30pm Monday-Friday, and every 15 minutes from 10:00am to 5:00pm on Saturdays. The DASH shuttle fare is 25 cents. These buses run north bound on North Broadway, turn west on College Street to Hill, travel north on Hill to Bernard Street which is the end of the line. After layover along Bernard Street, DASH buses return to downtown via North Broadway.

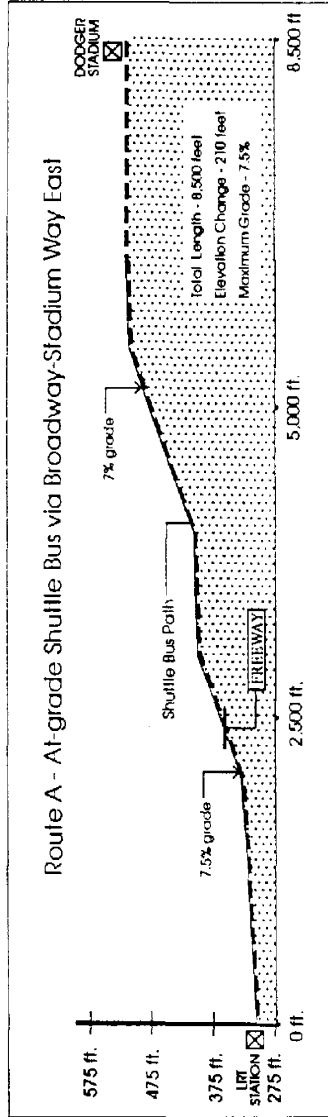
As shown in Figure 4, extension of DASH shuttle service to include Dodger Stadium would be possible via a loop that would

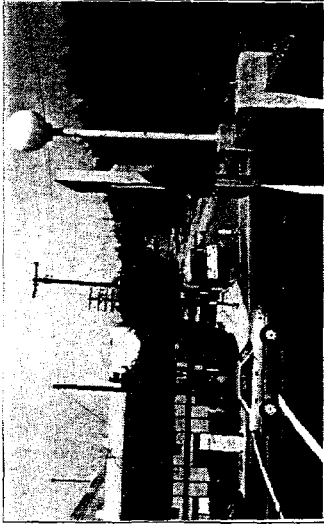
proceed up College Street to Stadium Way South, along the ring road of the Dodger Stadium parking area and back down Stadium Way East to North Broadway. Such a loop could provide service from the proposed College Street LRT Station on the Pasadena Line as well as direct service from downtown. During peak traffic periods at Dodger Stadium an alternate route down the hill could be utilized along Solano Avenue that would avoid heavy traffic congestion at Stadium Way East.

The one-way route length to the mid-point of the loop roadway is 7,500 feet via Stadium Way South, 8,500 feet via Stadium Way East and 9,500 feet via Solano Avenue. The steepest grades occur along the Stadium Way East segment where maximum grades of 7%-8% exist.

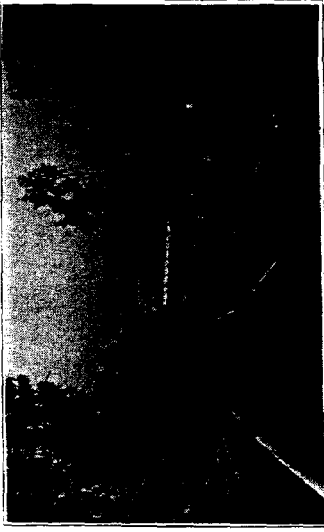


**DASH Shuttles:**  
City Department of Transportation shuttles have been very successful in providing service to Downtown Los Angeles and other areas of the City.

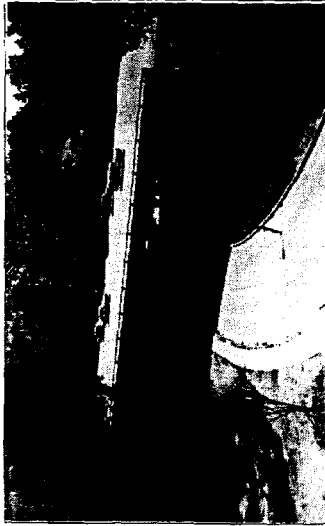




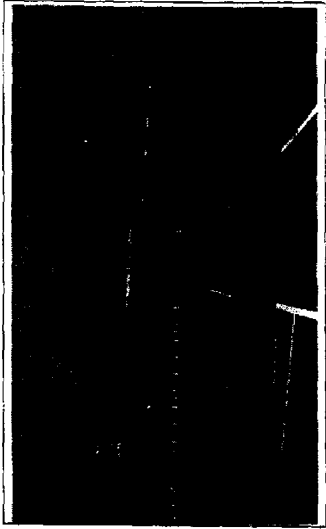
North Broadway at Bernard Street:  
DASH Shuttles currently layover on Bernard Street between North Broadway and Hill Streets.



Dodger Stadium principal entrance on Stadium Way East:  
The principal entrance to Dodger Stadium is from the east at the Pasadena Freeway. Direct freeway ramps converge on this entry which is heavily used during the periods immediately before and after stadium events. The high-rise structures of downtown Los Angeles are seen at the upper center of this photo.



Stadium Way East crossing of Pasadena Freeway:  
Access to Dodger Stadium is currently provided via Stadium Way East. This view shows the undercrossing of the Pasadena Freeway.

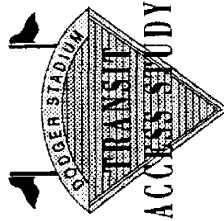


Dodger Stadium from parking lot #32:  
Terraced parking is provided along a circular ring road surrounding Dodger Stadium. Transit buses could pick up/discharge passengers along this ring road, or conversely, a single transit stop could be provided at a central location in the parking area.

FIGURE 5

①

ALTERNATIVE B  
ACT SHUTTLE



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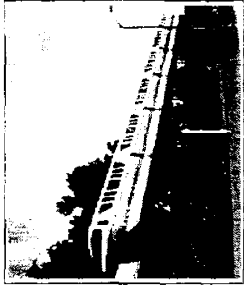
**2.2 ALTERNATIVE B  
AGT SHUTTLE**

The most direct connector alternative between the Pasadena Line and Dodger Stadium would be via an Automated Guideway Shuttle that would run back and forth along Stadium Way East from the future College Street Rail Transit Station to Dodger Stadium.

College Home Street to cross above the Pasadena Freeway, along the edge of Stadium Way East to Dodger Stadium. Once inside the Dodger Stadium parking area, the AGT line would run along the loop roadway with several station stops to allow pick-up and drop-off.

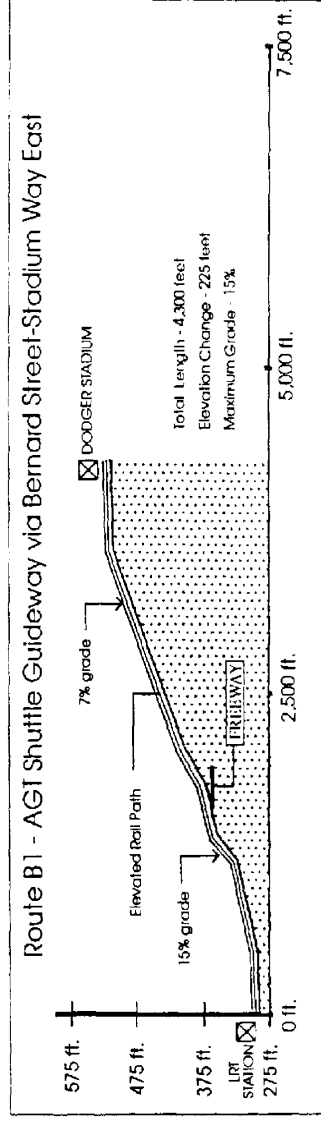
Various types of AGT technologies are possible for this route including monorail systems, rubber tired people mover, and steel-wheel systems. A discussion of the various AGT technologies is included in Chapter 3 of this report. As shown in Figure 5, two alternative routes are possible: B1) from the College & Spring Street Station along Bernard Street to cross above the Pasadena Freeway, along the edge of Stadium Way East to Dodger Stadium; or B2) from the College Street Station along

Because of steep slopes along Stadium Way East, light rail transit technology, which is being used on the Pasadena Rail Line, could not be used for this route. Maximum grades for light rail are approximately 6% and grades below Dodger Stadium on this route exceed 7%. Other technologies however, such as certain types of monorail can accommodate steeper grades than light rail technology and would therefore be more appropriate if this route were selected. Light



**AGT Shuttle:**  
The Disneyworld monorail in Orlando, Florida is a type of AGT technology that provides shuttle service between hotels and actively centers within the amusement park.

**Route B1 - AGT Shuttle Guideway via Bernard Street-Stadium Way East**



**Note:**  
Smoothing of grades to reduce slopes for alternative B1 to less than 15% would result in a relatively high guideway structure on Bernard Street.

monorail and other AGT technologies can generally handle grades of up to 8%-10%, which would make it possible to climb the 225 feet from the College & Spring Street Station to Dodger Stadium over the 4,300-foot length of this route. Mag-lev technology, such as the M-Bahn, Magnetic Transit of America prototype vehicle, can handle slopes of up to 10%, although practical applications of this technology have not been made to date.

Under this alternative, the guideway would be totally grade-separated. The columns could be placed either in the middle or on the side of the street and would displace at least one traffic or parking lane from the street. Conversely, straddle bents would be utilized as the guideway support with no traffic lanes taken, but property displacements would occur on both sides of the street. The crossing of the

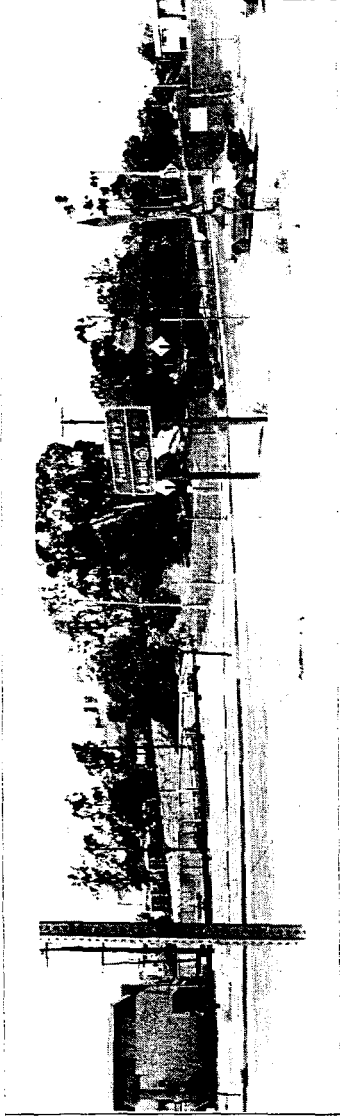
Pasadena Freeway would require that columns be strategically placed resulting in a relatively high structure above the Chinatown segment of the route. Route B2 is slightly shorter and more direct than Route B1, however Route B2 is adjacent to Cathedral High School and numerous residential structures. Route B1 is slightly longer, however adjacent properties along Bernard Street are generally vacant or used for commercial purposes.

*Route B1:  
This view looks west  
from North Broadway  
along Bernard Street.  
An elevated guideway  
would run along the  
center of side of Ber-  
nard Street where it  
would turn to the right  
to cross above the  
Pasadena Freeway.  
The blufftop parking  
lots of Dodger Stadium  
can be seen in the  
upper right of the  
photo.*



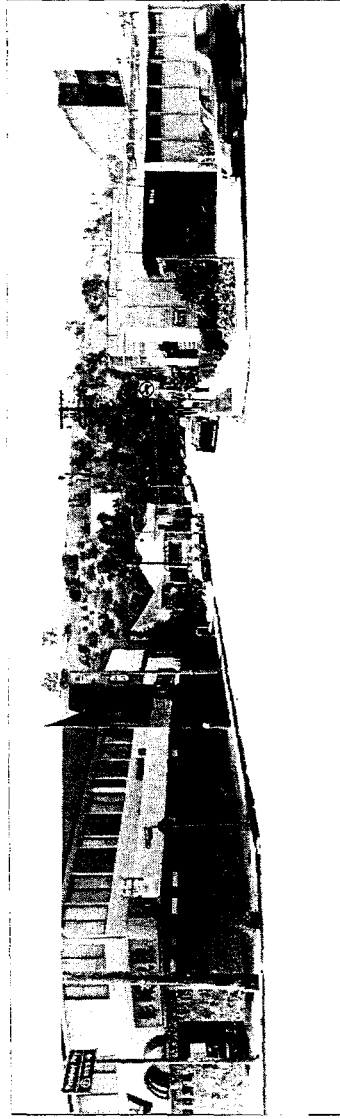
Route B1:

At the intersection of Bernard Street and the Pasadena Freeway, the elevated guideway would turn to follow the northbound Dodger Stadium off-ramp, seen at the right of the photo. The guideway would climb at a 6% to 10% grade in order to gain 225 feet of elevation between North Broadway and Dodger Stadium.



Route B2:

This view looks toward Dodger Stadium from North Broadway along Cottage Home Street. The northbound Dodger Stadium off-ramp from the Pasadena Freeway can be seen against the bluff backdrop. An elevated guideway would run along the center of side of Cottage Home Street and would turn to the right to follow the freeway off-ramp up to Dodger Stadium.

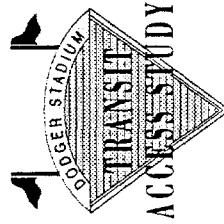


At the intersection of Cottage Home Street and the Pasadena Freeway the elevated guideway would cross over the Pasadena Freeway (seen in the center of this photo) and join the northbound off-ramp, at the left of the photo.





FIGURE 6  
 Ⓞ  
 ALTERNATIVE C  
 LRT SPUR



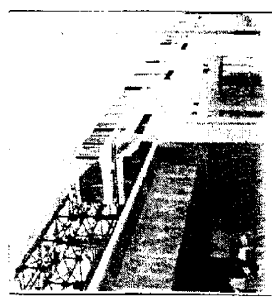
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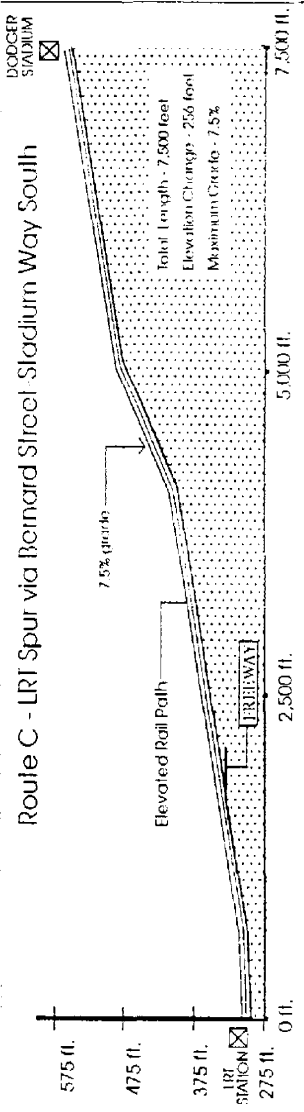
2.3 ALTERNATIVE C  
LRT SPUR

A spur track from the Pasadena Line would be possible to serve Dodger Stadium. As shown in Figure 6, such a spur track would branch north of College Street to cross above North Broadway and run along Bernard Street. At the Pasadena Freeway, a long-span structure would be required. The aerial guideway would climb along the south side of Stadium Way South. Near the Sunset Boulevard entrance to Dodger Stadium, the structure would curve along the backside of the south parking lot and cross over Stadium Way obliquely, crossing into the Dodger Stadium parking area. Once inside the Dodger Stadium parking area, the LRT spur line would run along the loop roadway with several station stops to allow pick-up and drop-off.

At 7,500 feet in length, this alternative is among the longest of the alternatives considered in this report. The greater length is necessary to accommodate the climbing characteristics of light rail technology. While this greater length adds to costs for this alternative, the use of the same technology as is being used on the Pasadena Rail Transit Project provides efficiencies in the service and maintenance of vehicles. Additionally, operational flexibility is afforded whereby extra trains could be added to serve special events at Dodger Stadium. It would even be possible for special "express" trains to run directly to Dodger Stadium from various parts of the rail network.



**LRT SPUR:**  
The Metro Blue Line which currently runs between Downtown Los Angeles and Long Beach has several grade separated stations and street crossings. Such grade separation would be necessary along a spur track serving Dodger Stadium.



**Note:**  
LRT technology can handle maximum slopes up to 6%. Therefore, some slope modifications would be required to maintain a constant grade of less than 6%.

**ROUTE C:**  
*This view looks north at Dodger Stadium from the adjacent bluffs along Figueroa terrace. Stadium Way West climbs toward the Stadium from the right of the photo where it passes the US Naval Armory complex and the Dodger Stadium ticket office.*



ROUTE C:

At the left of the photo, the Sunset Boulevard entrance to the stadium parking lots can be seen. Route C would follow Stadium Way and would cross above the street to enter the stadium parking lots.

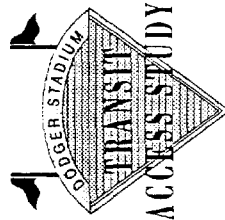




FIGURE 7

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ALTERNATIVE D  
CONDOLA TRAM



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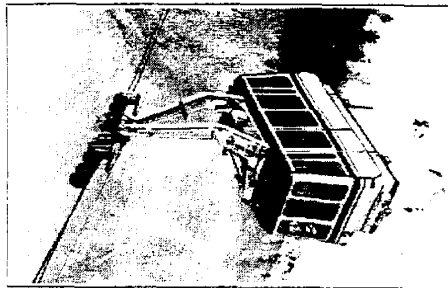
**2.4 ALTERNATIVE D  
GONDOLA TRAM**

The City of Los Angeles Planning Department has identified major re-use potential in the "Cornfield" railroad storage yards adjacent to North Broadway, along the route of the planned Pasadena Rail Transit Project. As a part of initial planning for redevelopment of this area, conceptual sketches illustrating possible future scenarios for the area show a gondola tramway connecting the heart of this redeveloped area to Dodger Stadium.

As shown in Figure 7, such a tramway could run from a central location in the planned Central City North Development Area to the top of Radio Tower Hill in Elysian Park, and then across the valley formed between Radio Tower Hill and the bluffs of the Dodger Stadium Parking area. A mid-station stop at Radio Tower Hill would open up this little used portion of Elysian Park to greater public use and at the same time, provide

a scenic view point, picnic and recreation area. The closest application of a technology such as this in Southern California is the Palm Springs Aerial Tramway at Mt. San Jacinto. This system utilizes cable cars accommodating up to 80 persons and move up to 400 persons per hour to the top of a 6,000 foot incline. A more urban application of this technology is the Roosevelt Island Aerial Tramway in New York City. This system was constructed in 1976 and moves 1,500 persons per hour between midtown Manhattan and Roosevelt Island in the middle of the East River. Many ski resorts utilize smaller, 4-8 person gondola cars than run in a continuous series. Systems such as the 8 person gondola at Steamboat Springs, Colorado can accommodate up to 2,800 persons per hour.

Two obvious problems are: 1) accessibility



*Gondola Tramway:*  
Ski resort technology has been adapted to amusement park and urban applications such as the Palm Springs Aerial Tramway and the Roosevelt Island Aerial Tramway in New York City.

**Route D- Gondola Tram via Radio Tower Hill**

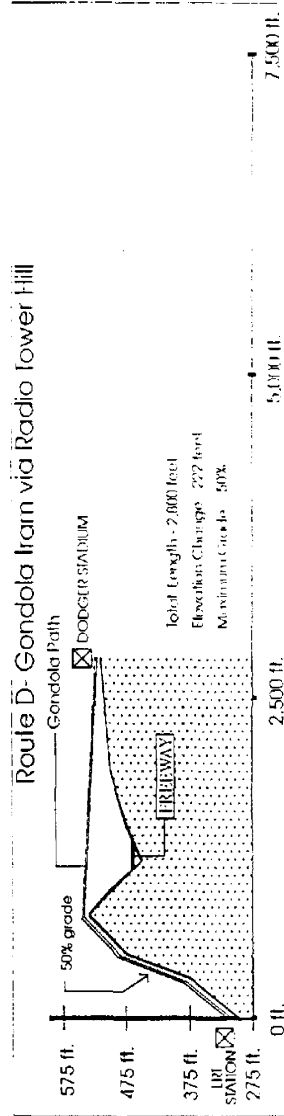
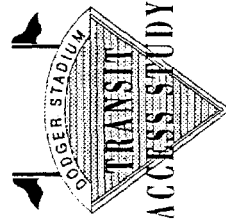




FIGURE 8



ALTERNATIVE E  
 ESCALATOR WALKWAY  
 CONNECTION



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ily to the individual lower support locations, and 2) whether the soil bearing capacity and friction resistance will be great enough to support the tower foundations. Several towers and foundations will be required. Also, the structure at the beginning of the aerial tramway located in the existing rail yard will have to be a sizeable structure in itself to keep the maximum climbing grades to a minimum and provide adequate clearance over North Broadway. In order for this technology alternative to connect directly to the Pasadena Los Angeles Rail Transit Project, a new station would need to be provided in the vicinity of North Broadway and the foot of Radio Tower Hill.

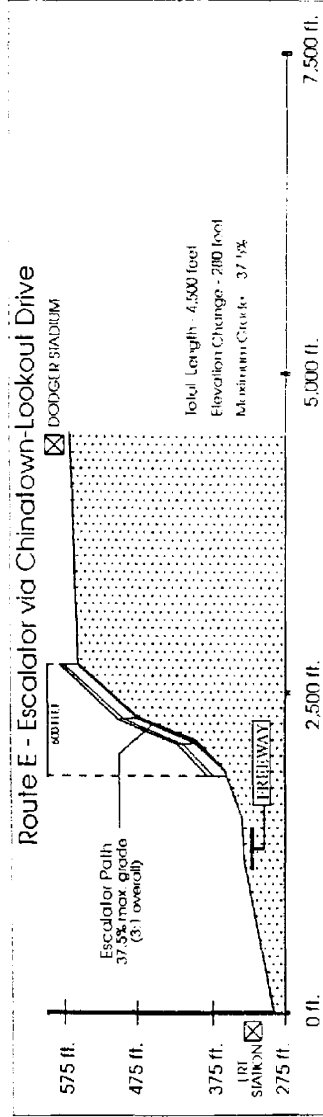
**2.5 ALTERNATIVE E  
ESCALATOR / WALKWAY**

Before and after events at Dodger Stadium and the Pasadena Line Station.

dium, large numbers of people entering and exiting the parking facilities cause congestion and delay for attendees. A drawback with any transit technology is this peak loading phenomenon whereby up to 56,000 persons seek to enter or leave Dodger Stadium within a brief period of time before or after events. Any technology used will develop queues with people waiting to board trains, buses, or simply exit the parking lot in their cars. Because of this waiting time, many attendees would prefer to walk some distance rather than wait in lines. Because it is less than one mile from Dodger Stadium to the College Street Rail Transit Station, many people could reach the station on foot following major events faster than they could be conveyed by transit. For these reasons, this alternative provides high-capacity vertical circulation to assist pedestrians with the 280 foot grade change between Dodger Stadium and the Pasadena Line Station.



**Dodger Stadium Escalators:**  
Escalators are presently used at Dodger Stadium to transport fans from different levels of the terraced parking lots. Additional use of such escalators would provide a high-capacity pedestrian route between the Pasadena Rail Line and Dodger Stadium.



21

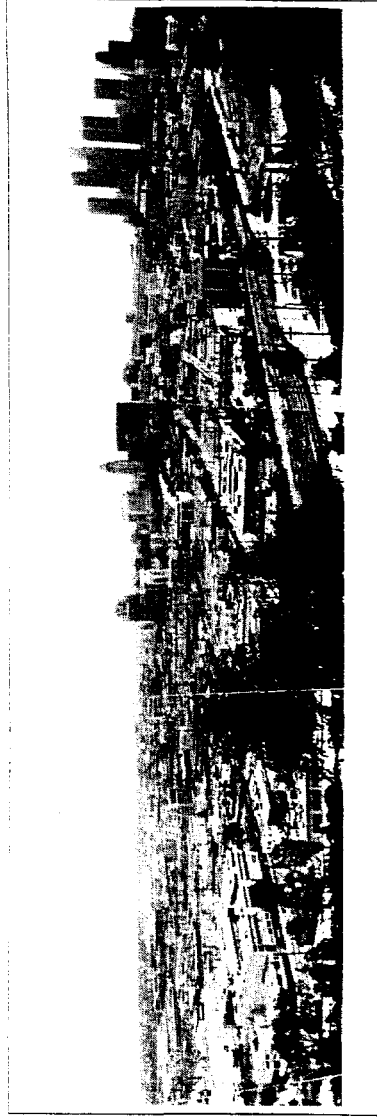
but allows them to walk or be conveyed on elevated moving walkways for the remainder of the route.

As shown in Figure 8, an existing pedestrian overpass above the Pasadena Freeway is provided at Bernard Street. It is less than 800 feet from this pedestrian bridge to the blufftop edge of Dodger Stadium parking lot #32, however there is a 200' rise in elevation over this same distance. Similar to the historic Angel's Flight inclined railway, an inclined escalator could provide automated pedestrian transport over this distance. Two 48" wide escalators would have a peak capacity of over 16,000 persons per hour. There is also very little waiting with this technology, thus allowing crowds to disperse quickly following events. At the foot of the Dodger Stadium hill, pedes-

trians would have a choice of routes between the pedestrian overcrossing and the College Street Rail Transit Station. An elevated walkway above Bernard Street could provide a automated walkway connecting directly to the rail transit station. Conversely, pedestrians could be directed through Chinatown where numerous restaurants, shops and pedestrian amenities are provided. A further option would be to take a DASH shuttle from this point directly to downtown.

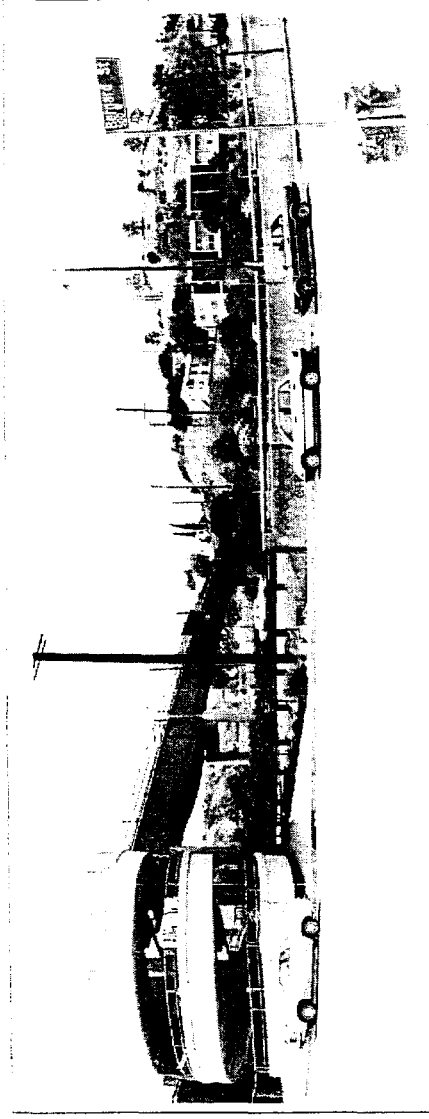
The total length from Dodger Stadium to the College Street Station would be 4,500 feet under this alternative, with an average walking time of 13 minutes. This is comparable to other alternatives such as LRT and AGT where waiting times during peak periods increase travel time. Also, passenger waiting following a game is

*Perhaps the best views of downtown Los Angeles are to be had from Dodger Stadium. This view looks south from the edge of the blufftop parking lots, across the Pasadena Freeway and the existing pedestrian overcrossing, toward Chinatown and the Civic Center area. Alternative Route E would provide access up this hillside from the pedestrian overcrossing to allow pedestrian access from DASH shuttles and the Pasadena Line.*



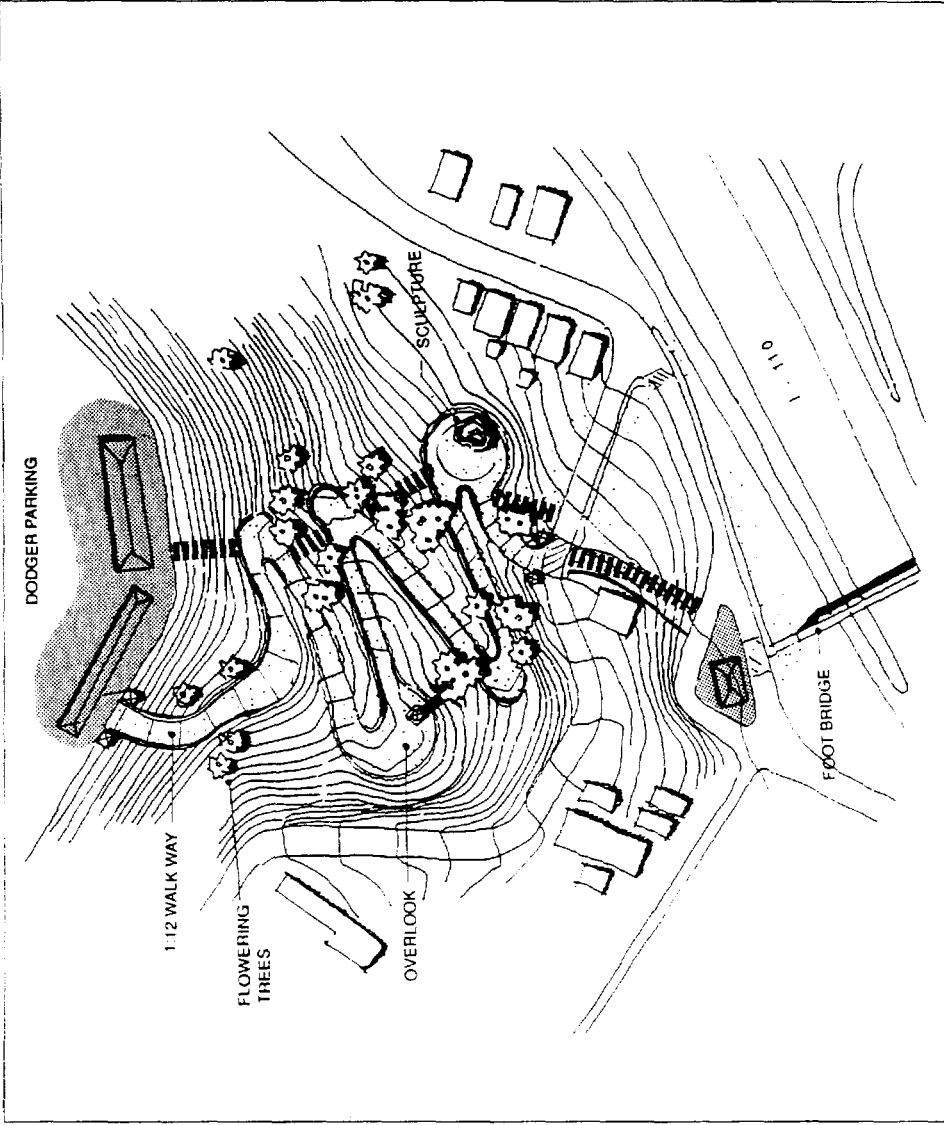


psychologically perceived as being three to four times longer than actual waiting time.



The existing Bernard Street pedestrian overcrossing of the Pasadena Freeway is seen in this view. The overcrossing could be improved to provide a better, more interesting walking environment that would connect to an escalator/parkway connection to Dodger Stadium on the opposite side of the Pasadena Freeway. The bluttop Dodger Stadium parking lots are seen at the upper right of the photo.

**Route E:**  
 From the pedestrian overcrossing of the Pasadena Freeway, an escalator similar to Angel's Flight on Bunker Hill could provide pedestrian access to the Dodger Stadium blufftop parking lots. A park-like landscaping theme would provide a walkway up the hill. Such a walkway could be designed with rest areas at viewpoints and picnic areas that could be used prior to Stadium events. The walkway designed to maintain handicapped-accessible slopes.



## 3.0 DEVELOPMENT AND INITIAL SCREENING OF ALTERNATIVES

The previous chapter described a selected group of technologies that can provide automated transit connection between Dodger Stadium and the planned Pasadena Rail Line. The alternatives presented were chosen to represent a range of possible solutions. This chapter broadens the discussion to discuss a family of transit technologies that would be possible to evaluate in future route refinement, environmental and engineering studies. The chapter also provides additional discussion of the key factors affecting the selection of a technology to serve Dodger Stadium.

### 3.1 TOPOGRAPHIC CONSTRAINTS & DOWNTOWN CONNECTION COMPATIBILITY

Perhaps the key factor in the selection of a technology to serve Dodger Stadium are the steep slopes surrounding the Dodger Stadium parking lots that would eliminate many types of transit technology from consideration at the outset. Any technology to be considered for further evaluation would need to be able to climb grades in excess of 8% over the shortest and most direct route to Dodger

Stadium on Stadium Way East, or over 6% for the longer, more gradual grade along Stadium Way South.

A second important consideration in the selection of any technology for further evaluation is the ability of that technology to interface with other transit systems that are existing or are being planned for the downtown area. The ability to connect Dodger Stadium to downtown Los Angeles directly has been mentioned in several planning studies dating from the Downtown People Mover in the early 1980's through current planning for the Bunker Hill Transit Tunnel/Downtown Circulator transit system. Technologies currently being evaluated for Downtown range from simple sidewalk improvements and moving sidewalk facilities, through cable driven technologies, rubber-tired automated systems (as have been used in many airports), steel-wheeled systems and advanced technology such as monorail and mag-lev systems. The following table provides a summary of the key characteristics of these systems and their general suitability to the topographic requirements of the Dodger Stadium connection.

\* Capacities based on 3-minute headways for applicable technologies.

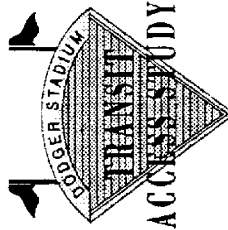
Table adapted from *Bunker Hill Transit Study: Phase 2*, LADOT, LACRA, Schimpeler-Corradino Associates/Deion Hampton & Associates, June 1990.

TABLE 2



**KEY CHARACTERISTICS OF TRANSIT TECHNOLOGIES**

(UNDER CONSIDERATION FOR DOWNTOWN LOS ANGELES DISTRIBUTOR SYSTEM)



LOS ANGELES COUNTY TRANSPORTATION COMMISSION

GRUEN ASSOCIATES

GANNETT FLEMING

Technology	Typical Capacity* (Passengers / Hour)	Maximum Speed (mph)	Maximum Grades
Moving Sidewalk / Escalator	3,000 - 10,000	2	15% (Sidewalk) 50% (Escalator)
Rubber-Tired	3,000 - 15,000	30 - 50	10%
Steel Wheel / Light Rail	20,000	50	6 - 8%
Monorail: Top-Riding Underlung	7,000 - 50,000 3,000	20 - 70 20	12%
Magnetic Levitation	9,000	50	8%
Cable-Driven	100 - 20,000	15 - 20	50% +

**Moving Sidewalks/Escalators:** Moving sidewalks are used at major airports to convey passengers between the terminal and boarding gates. They are also used at the Hollywood Bowl and at shopping centers such as the Beverly Connection in West Hollywood to convey passengers from parking areas to shopping and activity areas. Escalators are used outdoors in Downtown Los Angeles along the skybridges and plazas near Arco Plaza, the Bonaventure Hotel and the new First Interstate Tower. They are also used at many transit systems throughout the world including the future Metro Red Line stations in Downtown Los Angeles. Outside escalators are also used at Dodger Stadium to convey fans from different levels of the terraced parking facilities. Such systems operate continuously at about 2 miles per hour and because of their continuous operation, can carry large numbers of people. The actual capacity depends on the width of the walkway installed but ranges between 3,000 and 10,000 people per hour for each walkway provided. Moving sidewalks have limited applications for climbing grades with a maximum slope of about 15%. Escalators routinely handle 2:1 slopes exceeding 50%. Such a system has been identified as Route Alternative E in this study.

**Rubber-Tired:** Typical rubber-tired systems run on a dedicated right-of-way that is usually elevated in urban areas. Vehicles range in size from small minibus size to streetcar size and can usually be linked

into trains of several cars to increase carrying capacity. The most common application to date has been at airports to serve remote terminal and boarding areas. Capacities range from 3,000 to 15,000 passengers per hour at speeds of between 30-50 mph. Such a technology could be used under the Automated Guide-way Transit Alternative B in this report.

**Steel Wheel/Rail:** Both the Metro Blue Line and Metro Red Line are steel wheel systems. The Metro Red Line is defined as a heavy-rail system utilizing large, heavy vehicles running on full weight rails. Heavy rail systems would not be appropriate to serve Dodger Stadium because of slope limitations associated with this technology. Light rail systems, such as the Metro Blue Line currently running between Downtown Los Angeles and Long Beach, have lighter vehicles and lighter weight tracks. They run at slower speeds, and are capable of negotiating tighter turns than heavy rail systems. The future Pasadena Rail Line will be such a light rail system. Maximum climbing grades for light and heavy rail systems are about 6% for practical applications. This would preclude the use of this technology along Stadium Way East at Dodger Stadium and would necessitate the longer route along Stadium Way South described as the Route C alternative in this report.

**Monorail:** Southern Californians are familiar with monorail technology as one of the earliest applications was at Disneyland

in the late 1950's. Since that time, monorail technology has progressed, and although only the Seattle World Fair and DisneyWorld monorail have been built in the United States, over 40 miles of urban route service is currently in operation in Japan. This technology requires approximately 1/3 of the structure of comparable LRT and rubber-tired elevated systems because of its relative light weight. Monorails can be configured as either top-riding or underslung. Top-riding monorails usually utilize a concrete or steel box beam, with a rubber-tired vehicle riding on top and guide wheels at the sides. Underslung monorail systems are similar in appearance to ski resort cable cars, with vehicles suspended below a single slender steel track. Vehicle size can range from small "personal" vehicles through heavy rail size cars. Train capacity ranges from 7,000 to 50,000 passengers per hour at speeds ranging from 20 to 70 mph. Medium capacity monorail systems can generally climb grades of 10-12% which would make them appropriate for use at Dodger Stadium along the shortest, most direct route along Stadium Way East. Such a system would be suitable as an Automated Guideway Transit (AGT) Alternative B in this report.

Magnetic Levitation: The "M-bahn" system in Germany is currently the only application of this technology although prototype systems have been demonstrated for several years. Mag-lev technology utilizes electromagnetic resistance

to hold vehicles above the guideway, thereby providing smooth, frictionless travel. Mag-levs have high speed inter-city application at speeds exceeding 300 mph, but have also been demonstrated to have lower speed downtown applications, such as the Japanese HSST urban maglev system. This system can handle grades of 8% which would be marginally acceptable for the route to Dodger Stadium.

Cable Driven: Two types of cable-driven systems exist for downtown urban applications. The first type can run on steel rails, rubber tires or other support mechanism and be pulled by cable. The second type is supported by an overhead cable and also driven by cable. These systems operate at relatively low speeds of 15-20 mph and have capacities that are generally limited to between 1,000 and 4,000 passengers per hour. Very few applications of this technology exist in the United States in urban areas, although the technology has been used extensively in ski resorts and amusement parks. Applications in downtown Los Angeles are generally being considered for the Bunker Hill Transit Tunnel over a distance of less than one mile. Because of the low speed, it would be difficult to achieve any effective linkage between Dodger Stadium and downtown Los Angeles using this technology. The Gondola Tram alternative D has been included in this study to provide a comparison with the other alternatives and because of its potential application

In providing an attraction in its own right for the City North Development Area, Elysian Park and Dodger Stadium.

### 3.2 STADIUM EXITING, BOARDING & TRAVEL TIME

A unique feature of transit service at Dodger Stadium that would not occur to the same degree at other locations in the Downtown area, is the peak loading of any transit system that would occur following baseball games and other major events. Any technology used will develop queues with people waiting to board trains, buses or simply exit the parking lots in their cars. Table 3 presents a comparison of the technologies to determine waiting and travel times for the alternatives. In order to develop the analysis, the following assumptions were made:

- Average waiting times and travel times were developed based on the assumption that approximately 10% of an average crowd (40,000 attendees) would use transit to exit the stadium in the peak period following an event at the Stadium. This would mean that 4,000 persons would arrive and queue up at approximately the same time to board whatever mode of transit



was provided. Waiting times were then calculated based on the time that it would take each different transit mode to move 4,000 riders to the Pasadena Line Station at College and Spring Street.

- Typical transit technologies were selected to estimate system loading capacities. The following typical technologies were used:

Route A- Shuttle Bus: Standard RTD buses were assumed that can handle up to 60 persons per bus. Maximum headways of 30 seconds were assumed yielding a peak hour exiting capacity of 7,200 passengers per hour.

Route B- AGI Shuttle: A medium-capacity monorail technology was assumed. Such technologies could theoretically accommodate 90 second headways during peak periods configured in standard 6-car trains. Up to ten car trains would be possible, although such a configuration would require larger station platforms over 400 feet in length. 6-car train configurations would more closely match station platform lengths used on the Pasadena Rail Line and would accommodate up to 450 passengers per train. Boarding of 4,000 passengers would therefore require 10 trains, or 15 minutes.

Route C- LRT Spur: The light rail transit vehicle being planned for use on the Pasa-

**KEY**  
 Existing and Boarding  
 Travel Time  
 \* Travel time from Dodger Stadium to Pasadena Line at 4,000 passengers.

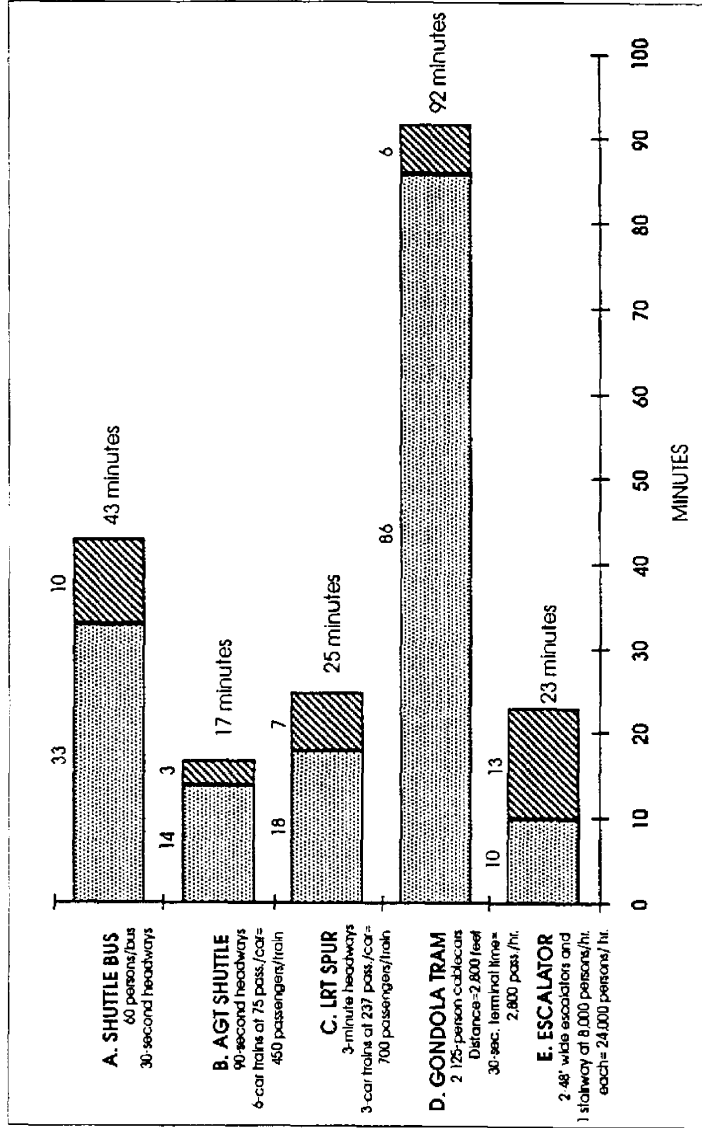
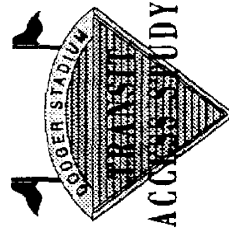


TABLE 3

**BOARDING AND TRAVEL TIME BY ALTERNATIVE**



LOS ANGELES COUNTY  
 TRANSPORTATION COMMISSION  
 GRUEN ASSOCIATES  
 GANNETT FLEMING



dena Rail Line was assumed. Such vehicles can accommodate up to 237 riders per car configured in three-car consists. At 3-minute headways, boarding of 4,000 passengers would require 6 trains, or 18 minutes.

Route D - Gondola Tram: The Roosevelt Island Aerial Tramway in New York City was used as a comparable model for the Dodger Stadium system. Roosevelt Island utilizes two cablecars that travel over a distance of 3,100 feet. The Dodger Stadium route would cover a distance of 2,800 feet under similar conditions. Capacity of the New York system is about 1,500 passengers/hour. By increasing the size of the cablecars and increasing speeds, a peak hour capacity of 2,800 persons per hour could be achieved. At this rate of boarding, it would take 86 minutes to board 4,000 passengers following an event at Dodger Stadium.

Route E - Escalator Walkway: Two 48" wide escalators would accommodate up to 8,000 passengers/hour each, or 16,000 passengers/hour total. A stairway would also be necessary that would accommodate a similar number of walkers going down the slope following an event at Dodger Stadium would increase the total capacity to 24,000 persons/hour. At this rate, 4,000 persons arriving at the top of the escalator/walkway could be accommodated in 10 minutes.

From this analysis, it can be seen that the

waiting time and boarding time is more critical in the evaluation of a connector system to Dodger Stadium than the actual travel time required to cover the one mile to the College & Spring Station. The AGT shuttle is both the shortest transit route, and the one requiring the shortest wait. The Escalator/Walkway Alternative however, compares favorably with other alternatives in total travel time due to the short route length and the short waiting time involved.

### 3.3 ENVIRONMENTAL ISSUES

Each of the alternatives considered would have environmental impacts associated with the construction and operation of these systems. A summary of potential environmental impacts associated with each alternative includes the following:

Route A - Shuttle Bus: The provision of an increased number of shuttle buses serving Dodger Stadium would add to congestion in Downtown and Chinatown during PM peak hour periods when evening rush hour traffic overlaps with pre-game arrivals at the Stadium.

Route B - AGI Shuttle: The construction of an aerial guideway structure along either Bernard Street or Coltage Home Street would require the reconstruction and re-

configuration of a two-story parking structure located on the east side of North Broadway. The guideway structure would also require the displacement of one lane of traffic (probably a parking lane) on Bernard Street with Option B1 or Cottage Home Street with Option 2. Visual and noise impacts would be greater with Option B2 than with Option B1 due to the proximity of Cathedral High School and more residential structures along Cottage Home Street than along Bernard Street. Construction of the aerial guideway above the Pasadena Freeway could require some temporary lane closures during the construction period to allow for the placement of guideway beams. Depending upon the technology selected, and the type of grades that are possible, the height of the aerial guideway could potentially reach 30 to 40 feet in height due to clearance and grade requirements associated with the freeway crossing creating visual impacts for adjacent land uses in Chinatown.

Route C - LRT Spur: Environmental impacts of this alternative would be similar to Route B with regard to potential impacts along Bernard Street and at the crossing of the Pasadena Freeway. Additionally, this alternative would require some grading at the edge of the bluffs along Stadium Way South to allow for flattening of the grades of the LRT aerial guideway structure as it enters the Dodger Stadium parking lots.

Route D - Gondola Tram: This alternative would require the displacement of at least one home along North Broadway to allow for the cablecar right-of-way between the Central City North Development Area and Radio Tower Hill. The visual impact of the cablecars and their support towers would need to be evaluated for possible impacts to Elysian Park and adjacent residential properties on North Broadway.

Route E - Escalator Walkway: This alternative would require the displacement of one home on Lookout Drive to allow for the escalator/walkway right-of-way connection between the Dodger Stadium parking lot #32 and the pedestrian bridge crossing of the Pasadena Freeway.

### 3.4 NEXT STEPS

This initial feasibility study has presented several possible connector options between Dodger Stadium and the planned Pasadena Line Rail Transit Station at College and Spring Streets. Basic data involving technology, slopes, costs, and environmental factors have been reviewed.

Before further technical work can be undertaken, a review of the ideas presented herein should be undertaken between the Dodgers and affected local agencies. This would include the Los Angeles City Coun-

cil, the Department of Transportation, the Los Angeles City Planning Department, the Los Angeles Community Redevelopment Agency, and Caltrans.

The provision of a transit connection would benefit the Dodgers by providing increased access to Dodger Stadium. Additionally, the connector could benefit others and other sources of funding may be available. Peripheral parking for Downtown Los Angeles is one potential benefit of the connector that could occur on weekdays when no events are scheduled at the Stadium.

Figures 9 and 10 on the following pages illustrate two of the potential connector concepts that have particular merit following initial screening. In the short term, the escalator walkway would permit pedestrian access to Dodger Stadium coupled with park enhancements in Elysian Park. In the longer term, the AGT Shuttle connector would provide high capacity direct transit that would link Dodger Stadium to Downtown Los Angeles and the entire 150 mile rail transit system under construction by the LACTC. In tandem, these two alternatives could function together and provide an important urban link that would serve the Dodgers, the City, and the greater Los Angeles Region.



FIGURE 9

ALTERNATIVE F

ESCALATOR / WALKWAY CONCEPT



LACTC  
LOS ANGELES COUNTY  
TRANSPORTATION COMMISSION





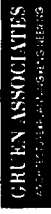
Note: AGT includes a number of different technologies.  
 Monorail is shown for illustrative purposes as  
 one such AGT technology.



FIGURE 10  
 ALTERNATIVE B  
 AUTOMATED GUIDEWAY (AGT)  
 SHUTTLE CONCEPT



LACTC  
 LOS ANGELES COUNTY  
 TRANSPORTATION COMMISSION



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## REFERENCES

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# EXHIBIT P

Exhibit P is related to Comment GO14-97 and GO14-165 and GO14-166. This Exhibit material was considered in the Response to Comment GO14-97 and GO14-165 and GO14-166.

# **Study Finds Proposed Aerial Gondola to Dodger Stadium Will Do Little to Reduce Traffic and Emissions**

October 24, 2022

University of California Los Angeles

## **Executive Summary**

Los Angeles Aerial Rapid Transit (LA ART), a subsidiary of former Dodgers owner Frank McCourt's company McCourt Global, wants to build an aerial gondola to take people from Union Station to Dodger Stadium. Promoters of the gondola claim that it will take 3,000 polluting cars off neighborhood streets and the 110 freeway before and after Dodger games, leading to a net reduction in greenhouse gas emissions.

Transportation researchers from the University of California, Los Angeles (UCLA) examined these claims using a state-of-the-art transportation simulation model and found that the gondola could reduce traffic on major roads around Dodger Stadium on the night of a sold-out game, but the impact would likely be very limited. They found that the gondola likely would take only around 608 cars off the road. The gondola is thus unlikely to significantly reduce greenhouse gas emissions and traffic overall.

## **Methodology**

The UCLA researchers — led by Dr. Brian Yueshuai He and Dr. Jiaqi Ma in the UCLA Mobility Lab at the UCLA Samueli School of Engineering — used the “LA Sim” model they created based on activity-based travel demand and agent-based simulation



models. The model is grounded in the theory of “discrete choice,” for which Daniel F. McFadden won a Nobel Prize in economics in 2000. Based on real data about road network, traffic, public transportation, and other modes of moving around the city, including walking and bicycling, LA Sim simulates the individual choices that millions of travelers will make when something changes, such as adding another form of transportation, like a gondola to the Los Angeles transportation network.

The researchers caution that this simulation only models the probable use of the gondola for a sold-out night game and further research could reveal different scenarios for a day game or double-header, for example. But the research does model the most likely scenario for fans to choose the gondola – when traffic around the stadium is likely to be most heavy. Around 85% of baseball games played at Dodger Stadium are night games, starting at 7:10pm.



**Figure 1: Traffic simulation results by the hour**

## Findings

- **Contrary to claims from LA ART, researchers found that the gondola would not significantly reduce traffic around Dodger Stadium.** Results showed the gondola would likely slightly reduce traffic on some roads around the stadium for a sold-out night game and increase traffic on others, leading to little

reduction in greenhouse gas emissions. The red lines in Figure 1 above indicate road segments that have a higher traffic volume after the proposed gondola is added to the traffic simulation. The blue lines indicate a decrease in traffic volume. According to the simulation, the total traffic volume would likely be reduced by around 0.9% (less than 1%) on the roads surrounding the stadium if the proposed gondola is built.

- **It's unlikely the gondola would contribute to a significant net decrease in greenhouse gas emissions.** Approximately 608 cars would be taken off the road, not nearly close to the 3,000 LA ART claims. Most of the people who choose the gondola in the simulation — 4,470 — board the gondola at Union Station, with another 220 passengers boarding at a station proposed to be located at Los Angeles State Historic Park near Chinatown. With only 4,690 people taking the gondola in total and of those 2,500 estimated to be regular users of the Dodger Stadium Express clean energy buses there would only be 2,190 new people taking public transportation to the game using the gondola. The average car parking at the stadium carries 3.6 people, which means that the approximate number of cars taken off the road would be around 608. The simulation only models the number of passengers connecting to the gondola via public transportation, on foot or by bike. It does not model people who would drive to Union Station or Chinatown to take the gondola. However, people who drive to those stations to take the gondola would not contribute to a net reduction in traffic or greenhouse gas emissions.
- **The gondola would carry fewer passengers than LA ART has claimed.** LA ART originally claimed that the gondola could carry up to 5,000 passengers per hour on game days. Researchers found that the gondola is likely to carry fewer than a total of 5,000 passengers to Dodger Stadium — 4,690 according to the simulation — even when the service is provided free with a game ticket for a sold-out night game like the playoffs. In a recent parking study, LA ART revised their claim, estimating that 6,000 would ride the gondola to games by 2026, with

4,350 arriving to the gondola via public transportation. The project's Draft Environmental Impact Report contains the same estimate, which corroborates the UCLA estimate of ridership if the gondola were in operation today.

- **Fewer people would take the gondola after the game – resulting in more traffic and emissions.** In the simulation, some fans – around 2,500 – seem to switch from the free Dodger Stadium Express buses to the gondola on the way from Union Station to a sold-out game, reducing the use of that service by close to half of the passengers it has carried to playoff games in the past. But about half of those passengers – more than 1,000 – seem to switch back to the Dodger Stadium Express on the way home, perhaps to avoid having to wait for a gondola car. Only 1,380 fans take the gondola on the way home in the simulation. This suggests that fans are unlikely to wait in line for the gondola after the game, instead taking the Dodger Stadium Express or perhaps opting for a ride-share, which would increase traffic and greenhouse gas emissions after the game.
- **Few people would use the gondola as a form of transportation other than to get to or from games.** The simulated use of the gondola during the daytime before the game suggests that very few people would use it as a form of transportation outside of getting to and from games: in the simulation, only 60 people – around one gondola carload – traveled to Dodger Stadium during the day, and only 140 passengers traveled from the stadium to Chinatown or Union Station during the day.
- **The model produced very similar results at different costs for a gondola trip.** LA ART previously announced that a gondola trip would cost \$15. Later, they announced that game ticket holders could ride the gondola for free. They have also said that local rides could be purchased for a standard Metro fare. The researchers modeled two scenarios: 1) \$10 for residents and free for game ticket holders, and 2) free to the public, and found very little difference in the results, indicating that residents are more likely sensitive to travel time rather

than cost. One key factor is that the service area of the gondola is limited and may not attract residents to choose it for daily travel.

### **About the Researchers**

Dr. He is an Assistant Research Scientist at the UCLA Mobility Lab. He has extensive experience in big data analytics, transportation system analysis, and transportation policy evaluations. In the scope of cyber-physical systems, his research enables interactions between the physical infrastructure and virtual cyber systems by adopting data-driven techniques to support long-term urban system planning, management, and decision-making.

Dr. Ma is an Associate Professor in the UCLA Samueli School of Engineering and Associate Director of UCLA Institute of Transportation Studies. He has led and managed many research projects funded by U.S. DOT, NSF, state DOTs, and other federal/state/local programs covering areas of smart transportation systems, such as vehicle-highway automation, Intelligent Transportation Systems (ITS), connected vehicles, shared mobility, and large-scale smart system modeling and simulation, and artificial intelligence and advanced computing applications in transportation. He is an Associate Editor of the IEEE Transactions on Intelligent Vehicles and IEEE Open Journal of Intelligent Transportation Systems and Journal of Intelligent Transportation Systems. He is Member of the Transportation Research Board (TRB) Standing Committee on Vehicle-Highway Automation, Member of TRB Standing Committee on Artificial Intelligence and Advanced Computing Applications, Member of American Society of Civil Engineers (ASCE) Connected & Autonomous Vehicles Impacts Committee, Co-Chair of the IEEE ITS Society Technical Committee on Smart Mobility and Transportation 5.0.

# EXHIBIT Q

Exhibit Q is related to Comment GO14-105. This Exhibit material was considered in the Response to Comment GO14-105.



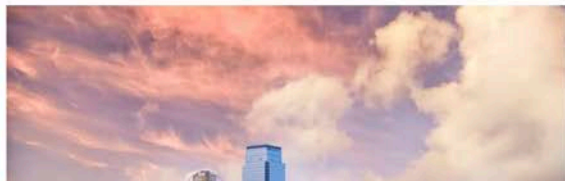
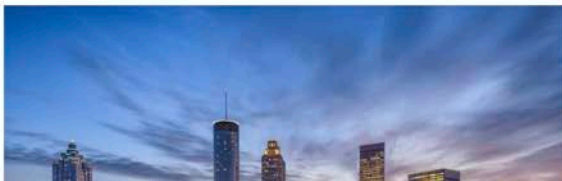
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## National Footprint



# EXHIBIT R

Exhibit R is related to Comment GO14-130. This Exhibit material was considered in the Response to Comment GO14-130.



Aerial Rapid Transit Technologies/Kilograph

**A RENDERING** of the proposed gondola to Dodger Stadium. The plan is opposed by some local critics.

## Damaging a hard-won park

Re “Hurdles loom for gondola proposal,” Jan. 10

Metro’s opaque deal with former Dodgers owner Frank McCourt to build a gondola to Dodger Stadium through L.A. State Historic Park would severely compromise people’s experience of the park, a taxpayer-funded green space that the area’s historically underserved residents fought for decades to establish.

The gondola would take public park land, destroy 81 mature trees, permanently alter the park’s thoughtfully designed vistas, jeopardize park event revenues and vital maintenance, and threaten the park’s significant historic features.

These impacts on the park would be an environ-

mental injustice. L.A. State Historic Park was born from an outpouring of community activism that transformed a rail yard into a green urban oasis, with all of the related health and community benefits. It is well used by residents, neighbors and visitors from throughout the city and has also become a vital, climate-resilient native landscape supporting local wildlife.

A project such as this would never be proposed over New York’s Central Park, so why should the residents of Northeast L.A. be subjected to it?

**KATHLEEN JOHNSON**  
Los Angeles

The writer is executive director of Los Angeles River State Park Partners.

::

In 2018, we visited La Paz, Bolivia, which has a gondola

transit system. The gondolas were phenomenal — quiet and efficient. We learned that they are fast and comparatively inexpensive to put up and get running.

When we got home, we realized that this would be a great system for L.A. How much cheaper and faster would it be instead finishing the subway down Wilshire Boulevard, which will take years to be operational?

But looks like L.A. might not even put one up to Dodger Stadium because of environmentalists and people who “fear” gentrification, not to mention lawsuits and bureaucracy.

**DAFNI BLACK**  
Culver City

::

The group Climate Resolve claims that this McCourt proposal will reduce traffic and pollution. A study conducted by my colleagues at the UCLA Mobility Lab found that the gondola will not reduce traffic significantly on the streets and highways around Dodger Stadium on game days and, therefore, will not reduce greenhouse gas emissions.

Furthermore, McCourt has not donated the project to Climate Resolve, according to county counsel. So why is Climate Resolve shilling for the project, while McCourt remains silent about his end game, a mas-

sive entertainment complex on the Dodger Stadium parking lots, which he has long touted?

This is greenwashing, pure and simple. We have better solutions. The existing Dodger Stadium Express from L.A. Union Station is 19 times more energy-efficient than the gondola would be per passenger trip. An individual electric vehicle is eight times more efficient.

**JON CHRISTENSEN**  
Los Angeles

The writer is an adjunct assistant professor at UCLA’s Institute of the Environment and Sustainability.

## A bad look for the LAPD

Re “The big names behind private funding that fuels the LAPD,” Jan. 8

Kudos to The Times for this important investigation about private donations to a foundation that supports the Los Angeles Police Department.

As a taxpayer, I don’t necessarily have a problem with foundations raising money to support law enforcement. But there does seem to be something unseemly about a police chief giving special access to wealthy donors. And, naming rights for LAPD facilities seems odd at best.



# EXHIBIT S

Exhibit S is related to Comment GO14-133. This Exhibit material was considered in the Response to Comment GO14-133. These comments are responded to separately in Response to Comments P708.



## Land Protection Partners

P.O. Box 24020, Los Angeles, CA 90024-0020  
Telephone: (310) 247-9719

January 16, 2023

### **Via Email to LAART@metro.net**

Mr. Cory Zelmer  
Deputy Executive Officer  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza, Mail Stop 99-22-6  
Los Angeles, California 90012

### **Re: Draft Environmental Impact Report: Los Angeles Aerial Rapid Transit Project**

Dear Mr. Zelmer:

The Los Angeles County Metropolitan Transportation Authority (“Metro”) has accepted an unsolicited project to build a private conveyance between Union Station and Dodger Stadium known as the Los Angeles Aerial Rapid Transit Project (the “Project”), has assumed Lead Agency status under dubious authority in that it is not the agency that has the principal responsibility for approving or carrying out the project, and has issued a Draft Environmental Impact Report (“DEIR”).

The conclusions in an EIR must be based on substantial evidence, which is discussed in the California Environmental Quality Act as follows (Pub. Res. Code § 21080, subd. (c)):

Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly inaccurate or erroneous, or evidence of social or economic impacts which do not contribute to or are not caused by, physical impacts on the environment, is not substantial evidence. Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts.

In the comments that follow we focus on the impacts to biological resources and identify that most of the conclusions and assertions in the DEIR are not supported by substantial evidence, and in fact substantial evidence supports the opposite conclusion from those assertions. As experts in environmental impact analysis of biological resources with decades of experience (see biographies below), we provide these comments as facts, reasonable assumptions predicated on facts, and expert opinion supported by facts.

## 1 Inadequate Biological Surveys

Biological surveys for the Project are described in Appendix E of the DEIR. The consultants purport to have surveyed the entire alignment on a single day (April 1, 2020), including a 500-foot survey buffer around the route. The methods do not describe how the biologist surveyed the entire three-dimensional project area, which extends up to 200 feet upward from the alignment. This third dimension is often ignored by biologists and its study requires appreciation of the speed at which animals move when aloft (Kunz et al. 2008). A 500-foot survey buffer is inadequate for assessing species that are moving through the air at a rate of 30 miles per hour (the speed of a typical songbird), thereby traversing the entire study area in less than 23 seconds. Furthermore, a single daytime survey in April cannot describe the volume and diversity of migratory birds that traverse the project location at night (most bird species migrate at night) during spring and fall migrations. In short, the survey effort on which the project biological assessment was made is inadequate to be considered substantial evidence regarding any impacts to wildlife and especially to birds that traverse the three-dimensional volume that would be impacted by the proposed project.

Published guidelines to reduce impacts of power lines identify many techniques to evaluate the bird use of areas in route planning (APLIC 2006). These include: daytime and nighttime visual observation using tools to measure distance and altitude of birds (clinometers and theodolites), closed circuit television recordings, night vision tools such as image intensifiers, forward-looking infrared devices, and radar. Radar techniques are well established and were developed in 1978 to detect birds specifically to evaluate the risk of new transmission lines (Korschgen et al. 1984). These tools can be used to develop a reasonable assessment of the quantity and general species composition of birds that might be at risk of collision. Examples of such efforts are available in the published literature. Williams et al. (2001) used radar, visual observations, and a ceilometer to describe birds migrating through a mountain pass. Mabee and colleagues have described bird numbers and altitude of flight using radar at proposed wind power sites (Mabee and Cooper 2004, Mabee et al. 2006). Others have used nocturnal flight calls to identify passing migrants (Farnsworth et al. 2004, Farnsworth and Russell 2007). Nocturnal flight calls have been used by community scientists in Los Feliz to document nocturnal migrants passing over the downtown Los Angeles area (see <https://www.youtube.com/watch?v=B1RyBDnCcgc&t=1s>).

## 2 Collision Risk

The DEIR acknowledges that installing large cables up to 195 feet in the air could pose a collision risk. The preparers' subsequent analysis of that risk, however, is replete with unsupported assertions and mischaracterizations of the literature.

The analysis of collision risk in the DEIR consists of the following statements in the main text and Biological Resources report (Appendix E):

- Ropeway cables would pose less danger than transmission lines because they are 1.75 to 2.5 inches in diameter compared with 1–2 inches for transmission lines and 0.5 inches for ground wires above transmission lines.

- The three ropeway cables would be spaced tightly in the vertical plane and so would pose less risk than if they were spread more broadly.
- The tight spacing of cables vertically would make them more visible.
- Cables would be made more visible by the moving cabins.
- Therefore avian collision risk from the cables would be less than for transmission lines.
- Concentrated avian activity is not expected near the project. Migratory movement is focused on prominent ridgelines, shorelines, and where favorable stopover habitat is located. The project is located “on a broad urbanized coastal plain, midway between the coast and the mountains, and lacks significant wetlands or similar habitats that might attract large numbers of migrants as stopover habitat.”
- Grouse and ptarmigan have poor maneuverability in flight and collide with ski lift cables but no similar species are found in the project area.

We consider these claims in turn.

**Cable size.** The DEIR relies on the idea that birds will be able to see the ropeway cables during the day because they can be half an inch larger than transmission wires. This is a preposterous claim. Notwithstanding citations in the DEIR, current published sources indicate that there is no evidence to back this claim, which derives from experiments on transmission lines comparing the main power lines, which are always lower and larger, with the ground wires, which are always smaller and located higher than the main lines (Bernardino et al. 2018). Studies that remove the upper, smaller wires document a decrease in avian mortality but there is “no possibility of disentangling the effects of wire height and diameter” (Bernardino et al. 2018). There is some experimental evidence suggesting that it is the placement of the ground wire that is the important factor and that making it larger does not decrease collisions (Brown et al. 1987). The DEIR therefore errs in relying on the assumption that a tiny difference in cable diameter will mitigate daytime collisions. It also will not mitigate collisions at night, which is when most migratory birds will encounter the structure and cables. Nocturnal migrants do not see cables, even the guy lines that hold up 2,000-ft communication towers that are much larger than the proposed cables (Longcore et al. 2008), because they encounter them in the dark. There may be “general agreement” in the literature that larger cables are safer, but the most recent scientific review “found little scientific evidence that these recommendations [including to use larger diameter cables] are effective” (Bernardino et al. 2018).

**Vertical spacing of cables.** The DEIR argues that because the three cables would be packed tightly in the vertical plane, they would pose less of a risk than if they were spaced out vertically. First of all, this claim has no evidence to support it in the published literature. Second, it imagines that all birds move in a single vertical plane through the atmosphere, as if they were aircraft on a flight path at a cruising altitude. That is not how birds move in space. Because birds increase and decrease in altitude as they use the airspace, the packing of the wires vertically is not the substantial mitigation measure that is assumed in the DEIR.

**Increased visibility of three cables.** The DEIR argues that because there are three cables in close proximity, birds will see them more. Again, power lines often have several lines together and still result in avian collisions and mortality. There is no evidence to support this self-serving claim, and it similarly does not address nocturnal collision risk.

**Risk relative to transmission lines.** The DEIR presents its unsupported assertion that the cables would cause less mortality than a similarly situated power line as if it were evidence that is impacts would be less than significant. This is incorrect on two fronts. First, the DEIR provides no substantial evidence that the rate of avian collision and mortality would be less than power lines. The height of the cables and of power lines are similar. There is no support to claim that moving cars attached to the cables would increase visibility (Bech et al. 2012) and especially moving cars would not be a factor in the middle of the night when the wires would be encountered by nocturnal migrants. Second, the question that must be answered for environmental analysis is not one of relative impacts, but whether the impact itself would be significant. Based on collision rates with power lines, any analysis of the impacts from the proposed project should start from the assumption that the 1.9 km length of the cables will kill up to 152 birds per year, and given the variability in collision rates, an average value would be 75 birds per year (Jenkins et al. 2010). This would be true of any aerial cable system at the heights proposed in the project area. The birds that could collide with it might include sensitive species (given their presence in the surrounding park and along the Los Angeles River) and therefore this should be considered to be a significant impact, both through direct adverse effects on sensitive species and interference with migratory wildlife corridors. The DEIR, in contrast, asserts there will be no adverse effects because it asserts that there will be no concentration of avian movement intersecting with the site, which we consider next.

**Concentrated avian movement.** The DEIR makes the claim that the project site is in the middle of a broad coastal plain, lacking topography to concentrate migrants and lacking habitat that would attract birds as stopover locations. These assertions are flawed.

Significance of impacts depends not necessarily on the quantity of birds but on whether sensitive species are affected. Many sensitive bird species migrate through Los Angeles and could encounter the project site.

The assertion that there is no stopover habitat to attract birds ignores the presence of the Los Angeles River and Silver Lake Reservoir Complex, which is a significant stopover habitat for waterfowl, in close proximity to the site. An assessment of this question must look at a broader landscape context than the 500-ft buffer considered in the DEIR because, as noted, birds fly quickly through the air and major stopover locations are found within a few minutes flight from the project site.

There is another factor that concentrates avian migrants that is entirely ignored by the DEIR: artificial light at night. Nocturnally migrating birds can be tracked on weather radar and research has now shown that light at night escaping upwards is associated with greater numbers of birds present during the day, especially in the fall when juveniles are migrating south (La Sorte et al. 2017). As birds are migrating southward they are attracted to lights and then end up disproportionately using habitats in and around cities as compared with potentially better habitats elsewhere (McLaren et al. 2018). Lights can rapidly increase the density of migratory birds in an area at night. A study of the “Tribute in Light” installation in New York documented an increase from 500 birds within 0.5 km of the vertical light beams before they were turned on to 15,700 birds within 0.5 km 15 minutes after illumination (Van Doren et al. 2017). Downtown Los Angeles also attracts and concentrates birds, especially in the springtime, based on radar

measurements (Horton et al. 2019). Dodger Stadium itself creates one of these exceptionally bright points on the landscape and would itself attract and disorient birds, as was seen recently with a Greater White-Fronted Goose at a Dodgers playoff game. Therefore, contrary to the assertions in the DEIR, this location is associated with concentrations of avian migrants.

**Species susceptible to collision found in project area.** The DEIR references a study of grouse and ptarmigan collision with ski lifts (Bech et al. 2012) to conclude that no similar low maneuverability species vulnerable to collision are found in the project area. The DEIR ignores the big message from that paper, which is that searches for carcasses only reveal a small fraction of the birds killed at elevated wires. In that instance, a bird had collided with the wires and was found 600 m (1,969 ft) away, far outside the zone typically searched for mortality at wires. The steep topography of the site may have contributed to this distance, but the genetic linking of an individual bird to feathers underneath an obstruction 600 m away suggests that many current estimates of avian mortality at elevated obstructions are low (Bech et al. 2012).

The DEIR does not provide important information about what groups of species are more vulnerable to collision (Bevanger 1994, Savereno et al. 1996, Bevanger 1998, Janss 2000). Although all bird species are potentially exposed, the species that are typically at greatest risk are large, heavy, relatively small-winged birds with poor vision (Jenkins et al. 2010). The most susceptible groups tend to be waterbirds and in particular large ducks, geese and swans, pelicans, large herons and waders (Jenkins et al. 2010). Rails, coots, and cranes (Gruiformes) are most frequently recorded birds killed at power lines (Bevanger 1998). Other groups at risk include waterbirds and diving birds such as ducks (Anseriformes) and loons (Gaviformes), which also have high “wing loading,” which means that their wings are small relative to their weight (Bevanger 1998). Records of mortality of species in these groups are common also because they are larger, more easily detected, less likely to be carried off by scavenger, and therefore more likely to be recorded. Other species that are theoretically prone to collisions based on their size, wing loading ratio, and vision are found less in surveys, probably because they are smaller and harder to detect (Drewitt and Langston 2008), or travel significant distances after being injured (Bech et al. 2012). These more sensitive groups would include pigeons (including native Columbiformes such as Band-tailed Pigeon and Mourning Dove), some passerines, and high-speed predators such as falcons (Jenkins et al. 2010). Aerial predators, such as swifts, many raptors, and even gulls, are at risk because they spend so much time in flight that have an increased probability of colliding with wires than other species that fly less (Bevanger 1998, Janss 2000).

In conclusion, the collisions analysis in the DEIR misrepresents the published literature and is not based on substantial evidence. The proposed aerial tramway will kill birds through collisions and the proximity of waterbirds attracted to nearby habitats at the Los Angeles River and Silver Lake Reservoir Complex, combined with the excessive light escaping from downtown Los Angeles (Pack et al. 2017), increases the probability of such collisions and the resulting annual fatality rate. From a CEQA perspective, this represents interference with a migratory pathway and adverse impacts on sensitive species, which are included in the migratory species that traverse Los Angeles routinely. It deserves mention that avian collisions with power lines (or by extension, the proposed aerial tram system) cannot be eliminated through mitigations (Alonso et al. 1994, Brown and Drewien 1995, Janss and Ferrer 1998).

### 3 Lighting

The DEIR does not fully describe all sources of lighting. It makes a vague mention of digital billboards (p. ES-11) as follows:

[E]lectronic digital displays and/or changeable message light-emitting diode (LED) boards that include both transit information and other content, which may include off-site advertising that generates proceeds to support transit system costs and operations. Signage would be architecturally integrated into the design of the ART system including its stations, the junction, towers, and cabins.

The prospect of LED billboards festooning the towers, gondolas, and stations is not adequately accounted for in the environmental analysis of biological resources and in fact is not considered at all. The aesthetics analysis contains no renderings of the project at night, so decisionmakers are lacking critical information to understand the full impacts of the lighting from the project both for impacts on visual resources and for the impacts of light pollution on biological resources.

The proposed “project design feature” for lighting (AES-PDF-A) violates national standards set by the Illuminating Engineering Society for off-roadway outdoor signage (RP-39-19). The project proposes 10,000 candela per square meter during the day, when the highest allowable brightness by national standards is 3,500 candela per square meter. At night, the project design feature proposes 300 candela per square meter, while the highest allowable brightness for the lighting zone appropriate for a business district (LZ3) is 80 candela per square meter. The portion of the project in the State Park and heading up into Chavez Ravine should probably be classified as LZ2, where the maximum allowable luminance is 40 candela per square meter. LZ3 is defined as, “Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting may be continuous and is required for safety and convenience at night. This is the recommended default zone for large cities’ business districts),” and LZ2 is defined as, “Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting *may* be required for safety and convenience at night. This is the recommended default zone for light-commercial business districts and high-density or mixed-use residential districts” (Illuminating Engineering Society, RP-39-19, Recommended Practice: Off-Roadway Sign Luminance: An American National Standard).

The lighting “project design feature” also defines brightness in terms of Watts, which is not useful. Lights have different efficiencies and the restriction that, “Building Lighting will not exceed 60 watts” is not useful unless the lamp type is specified. It should indicate the total lumens that can be produced per fixture rather than specifying energy consumption. The related limitation on light output for outdoor luminaires of 6,200 lumens is set unreasonably high. That is the equivalent of having ten 60-Watt incandescent bulbs in a single fixture. A “design feature” with this limitation will do nothing to mitigate the impacts of the proposed lighting infrastructure on visual resources or people who are exposed to the lights from their residences.

The Visual Impact Analysis in the DEIR does not evaluate whether any of the proposed lighting from the project would violate Los Angeles Municipal Code Section 93.0117, which reads:

No person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to be either illuminated by more than two footcandles (21.5 lx) of lighting intensity or receive direct glare from the light source:

1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units.
2. Any elevated habitable porch, deck or balcony on any other property containing a residential unit or units.
3. Any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units.

EXCEPTIONS: This subsection shall not apply to:

1. Any frosted light source emitting 800 lumens or less.
2. Any other light source emitting more than 800 lumens where the light source is not visible to persons on other residential property.

Given that much of the infrastructure proposed will be several stories in the air, it is highly likely that even if lights are shielded from being directed upward, they will result in direct glare on residences in violation of Municipal Code. The calculations provided in the technical appendix are focused on illuminance measurements, when the code allows no direct glare, regardless of the illuminance. None of the Lighting Design Report calculations show compliance with this code section.

Finally, it is unclear the extent to which the stations will remain illuminated at night and overnight and to what extent the shells of the large canopies are transparent. From the renderings it appears that they are somewhat translucent, and therefore would result in escaping light at night, appearing as large glowing masses in the sky at night.

The lighting report also illustrates several examples of uplighting of structures and landscape elements, which is inconsistent with the text in the DEIR claiming that lights will be “shielded,” which normally implies that light would be directed downward (see pp. 3.1-8 and 3.1-9 of DEIR). Uplighting is always an adverse environmental impact and illuminating trees at night is harmful to their health (Briggs 2006, Bennie et al. 2016, Meng et al. 2022) and should be avoided.

#### **4 Structure Design Likely to Result in Large Rock Pigeon Roosts**

Project designers do not appear to realize that a large open canopy as depicted in the project renderings in the Lighting Design Report, combined with exposed structural beams and girders, is likely to result in large Rock Pigeon roosts. Pigeons can be vectors of disease and their droppings would foul the surfaces in the stations. The DEIR should consider this eventuality and

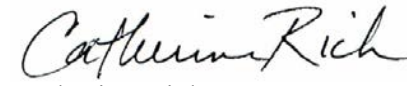


disclose the chemical and/or physical methods that would be used to exclude pigeons from roosting from within these structures. The station design is setting up the operators to be under pressure to undertake ongoing, potentially inhumane, measures to control pigeon numbers.

Sincerely,



Travis Longcore, Ph.D.



Catherine Rich, J.D., M.A.

## 5 About the Authors

Dr. Travis Longcore and Catherine Rich are principals of Land Protection Partners. Dr. Longcore is Associate Adjunct Professor in the Institute of the Environment and Sustainability at UCLA. He has taught, among other courses, Bioresource Management, Environmental Impact Analysis, Field Ecology, and Ecological Factors in Design. He was graduated *summa cum laude* from the University of Delaware with an Honors B.A. in Geography, holds an M.A. and a Ph.D. in Geography from UCLA, and is professionally certified as a Senior Ecologist by the Ecological Society of America and as a GIS Professional by the Geographic Information System Certification Institute. He is a 24-year member of the Los Angeles County Environmental Review Board. Catherine Rich is Executive Officer of The Urban Wildlands Group. She holds an A.B. with honors from the University of California, Berkeley, a J.D. from the UCLA School of Law, and an M.A. in Geography from UCLA. She is lead editor of *Ecological Consequences of Artificial Night Lighting* (Island Press, 2006) with Dr. Longcore. Longcore and Rich have authored or co-authored over 60 scientific papers in top peer-reviewed journals such as *Auk*, *Biological Conservation*, *Conservation Biology*, *Environmental Management*, *Frontiers in Ecology and the Environment*, *Trends in Evolution and Ecology*, and *Urban Forestry and Urban Greening*. Longcore and Rich have provided scientific review of environmental compliance documents and analysis of complex environmental issues for local, regional, and national clients for 23 years.

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# EXHIBIT T

Exhibit T is related to Comment GO14-153. This Exhibit material was considered in the Response to Comment GO14-153.

R/W 2 0001-315  
2-12 Bd Accepts

1. When Recorded Mail To:

2 State Department of Parks and Recreation.  
3 P. O. Box 942896  
4 Sacramento, CA 94296-0001

4 Attn: Betty Paris, Acquisition Division

5 \_\_\_\_\_ Space above for Recorder's Use \_\_\_\_\_  
6

SSL-403

STATE OF CALIFORNIA

QUITCLAIM DEED

8 Pursuant to the provisions of Chapter 1358, Statutes of 1987, the  
9 STATE OF CALIFORNIA, acting through its Director of General Services, hereby  
10 quitclaims to CITY OF LOS ANGELES, all its right, title and interest in and to  
11 the real property described in Exhibit A hereto, which Exhibit is incorporated  
12 herein by this reference, in the County of Los Angeles, State of California.

14 EXCEPTING AND RESERVING to the State of California all mineral  
15 deposits as defined in Section 6407 of the Public Resources Code below a depth  
16 of 500 feet; without surface rights of entry.

18 This deed is subject to the following express conditions subsequent:

20 1. The property shall be known as El Pueblo de Los Angeles  
21 Historic Monument and shall be used as a public park or monument.

23 2. The development and operation shall conform to the General Plan  
24 for El Pueblo de Los Angeles State Historic Park adopted April 11, 1980  
25 pursuant to Section 5002.2 of the Public Resources Code. The Plan may be  
26 amended by the CITY in accordance with procedures for amendment set forth in  
27 Article 8 (commencing with Section 65450) and Article 9 (commencing with

5408-7-901,904  
5408-6-900  
5408-8-905  
5408-11-907,908

Form and Purpose  
Checked by                       
Date FEB 9 1990

1 Section 6500) of Chapter 3 of Division 1 of Title 7 of the Government Code.  
2 The CITY shall consider the development criteria of Section 5019.59 of the  
3 Public Resources Code.  
4

5 3. The City of Los Angeles shall operate, improve, maintain,  
6 construct, remodel, and perform any and all necessary activities at the  
7 Historic Monument in compliance with the U.S. Secretary of the Interior's  
8 "Standards for Rehabilitation and Guidelines for Rehabilitating Historic  
9 Structures".  
10

11 4. The State of California shall be allowed, at the STATE'S  
12 option, free occupancy of the existing STATE offices on the entire first and  
13 second floors of the Hellman Quan Building, located at 128 Paseo De La Plaza,  
14 Los Angeles, California (See Exhibit B, Sheet 1) incorporated herein by this  
15 reference, with the exception of the CITY Archives Room on the second floor  
16 (See Exhibit B, Sheet 2) together with four existing parking spaces located  
17 along Sanchez Street. Upon termination of parking along Sanchez Street, the  
18 CITY will provide four new parking spaces to be identified within future  
19 parking Lot No. 2 located on the corner of Main Street and Macy Street.  
20

21 Should any of said express conditions be violated, the State of  
22 California shall have the right to reenter and take possession of the real  
23 property and upon such re-entry title thereto shall revert to the STATE.  
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IN WITNESS WHEREOF, The STATE has caused this Quitclaim Deed to be  
executed this 27th day of October, 1988.

STATE OF CALIFORNIA  
DEPARTMENT OF GENERAL SERVICES  
W. J. ANTHONY, DIRECTOR

By:   
PAUL V. SAVONA, Chief  
Office of Real Estate  
and Design Services

APPROVED:  
DEPARTMENT OF PARKS AND RECREATION

By 

Attachment

STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

} SS.

On this 1st day of November, 19 88, before me, the undersigned, a Notary Public in and for the State of California, personally appeared PAUL V. SAVONA

personally known to be or proved to me on the basis of satisfactory evidence to be the person who executed this instrument as Chief of the Office of Real Estate and Design Services, Department of General Services of the State of California, and acknowledged to me that the State of California executed it.

WITNESS my hand and official seal.



Eunice I. Matlock  
EUNICE I. MATLOCK  
NOTARY PUBLIC IN AND FOR THE STATE OF CALIFORNIA

STATE OF CALIFORNIA )

COUNTY OF SACRAMENTO )

} SS.

On this 27<sup>th</sup> day of October, in the year of 19 88, before me, SUSAN P. HARRINGTON, a Notary Public in the State of California, duly commissioned and sworn, personally appeared Les McCargo, known to me to be the Deputy Director of Parks and Recreation of the State of California and acknowledged to me that he executed the within instrument in the name of and in behalf of the State of California.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in said county, the day and year first written above.



Susan Harrington  
Notary Public



EXHIBIT "A"

1  
2  
3 All that real property situate in the City of Los Angeles, County of Los  
4 Angeles, State of California, described as follows:

5  
6 PARCEL 1

7  
8 All those lands conveyed to the State of California by the McLaughlin  
9 Corporation by Corporation Grant Deed dated July 17, 1953 and recorded  
10 December 29, 1953 in Book 43478 at Page 430, Official Records of said County.

11  
12 PARCEL 2

13  
14 All those lands conveyed to the State of California by the Union Bank and  
15 Trust Company of Los Angeles, as Executor of the Estate of Constance D.  
16 Simpson, also known as Constance Doria Simpson, deceased, by Deed dated  
17 September 17, 1953 and recorded December 29, 1953 in Book 43481 at Page 359,  
18 Official Records of said County, and by Irving M. Walker, as Trustee, under  
19 the Will of Doria C. Lankershim, by Quitclaim Deed dated March 5, 1963 and  
20 recorded May 27, 1963 in Book D2043 at Page 496, Official Records of said  
21 County.

22  
23 PARCEL 3

24  
25 All those lands conveyed to the State of California by James A. Rimpau,  
26 Trustee, by Deed dated July 14, 1953 and recorded December 31, 1953 in  
27 Book 43498 at Page 295, Official Records of said County.

1 PARCEL 4

2

3 All those lands conveyed to the State of California by Los Nietos, Company, a  
4 corporation, by Deed dated August 4, 1953 and recorded December 31, 1953 in  
5 Book 43498 at Page 287, Official Records of said County and by Final Order of  
6 Condemnation dated March 2, 1961 and recorded March 3, 1961 as Document  
7 No. 4201 in Book D1143 at Page 905, Official Records of said County.

8

9 PARCEL 5

10

11 All those lands conveyed to the State of California by Mae N. Lombardi, et al.  
12 by Deed dated November 4, 1953 and recorded February 1, 1954 in Book 43717 at  
13 Page 437, Official Records of said County.

14

15 PARCEL 6

16

17 All those lands conveyed to the State of California by Quon How Shing by Deed  
18 dated August 28, 1953 and recorded February 26, 1954 in Book 43939 at  
19 Page 247, Official Records of said County.

20

21 PARCEL 7

22

23 All those lands conveyed to the State of California by Audette Marie Garnier  
24 and Yvonne Garnier by Deed dated January 11, 1954 and recorded April 22, 1954  
25 in Book 44389 at Page 74, Official Records of said County.

26 ---

27 ---

1 PARCEL 8

2

3 All those lands conveyed to the State of California by Stella Anne Valla  
4 Hamilton, et al. by Deed dated November 2, 1953 and recorded April 30, 1954 in  
5 Book 44460 at Page 218, Official Records of said County and by Final Order of  
6 Condemnation dated February 21, 1958 and recorded February 27, 1958 as  
7 Document No. 3409 in Book D27 at Page 369, Official Records of said County.

8

9 PARCEL 9

10

11 All those lands conveyed to the State of California by G. Pagliano and Dora C.  
12 Pagliano by Deed dated September 4, 1953 and recorded June 4, 1954 in  
13 Book 44735 at Page 317, Official Records of said County, and by Anita  
14 Brodrick, et al. by Quitclaim Deed dated April 21, 1958 and recorded  
15 September 18, 1958 in Book D220 at Page 181, Official Records of said County.

16

17 PARCEL 10

18

19 All those lands conveyed to the State of California by Paul Mance and Amalia  
20 Mance by Deed dated June 3, 1954 and recorded December 21, 1954 in Book 46434  
21 at Page 81, Official Records of said County.

22

23 PARCEL 11

24

25 All those lands conveyed to the State of California by Title Insurance and  
26 Trust Company by Grant Deed dated March 13, 1956 and recorded September 28,  
27 1956 in Book 52429 at Page 437, Official Records of said County.

1 PARCEL 12

2

3 All those lands conveyed to the State of California by Final Order of  
4 Condemnation dated November 24, 1958 and recorded November 28, 1958 as  
5 Document No. 5617 in Book D289 at Page 777, Official Records of said County.

6

7 PARCEL 13

8

9 All those lands conveyed to the State of California by Final Order of  
10 Condemnation dated December 22, 1958 and recorded December 23, 1958 as  
11 Document No. 4426 in Book D313 at Page 894, Official Records of said County.

12

13 PARCEL 14

14

15 All those lands conveyed to the State of California by Virginia Nicolas Miles,  
16 et al. by Deed dated September 4, 1958 and recorded January 26, 1959 in  
17 Book D343 at Page 528, Official Records of said County.

18

19 PARCEL 15

20

21 All those lands conveyed to the State of California by Final Order of  
22 Condemnation dated January 22, 1959 and recorded January 30, 1959 as Document  
23 No. 4155 in Book D350 at Page 540, Official Records of said County.

24 ---

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27 ---

1 PARCEL 16

2

3 All those lands conveyed to the State of California by Dora C. Pagliano, et  
4 al. by Quitclaim Deed dated February 10, 1958 and recorded February 17, 1959  
5 in Book D367 at Page 644, Official Records of said County.

6

7 PARCEL 17

8

9 All those lands conveyed to the State of California by Justino Jimenez by Deed  
10 dated December 3, 1958 and recorded February 20, 1959 in Book D372 at  
11 Page 869, Official Records of said County.

12

13 PARCEL 18

14

15 All those lands conveyed to the State of California by Final Order of  
16 Condemnation dated May 25, 1959 and recorded May 25, 1959 as Document No. 4400  
17 in Book D479 at Page 210, Official Records of said County.

18

19 PARCEL 19

20

21 All those lands conveyed to the State of California by Final Order of  
22 Condemnation dated July 17, 1959 and recorded July 20, 1959 as Document  
23 No. 3818 in Book D542 at Page 155, Official Records of said County.

24 ---

25 ---

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1 PARCEL 20

2

3 All those lands conveyed to the State of California by Louis Foix, et al. by  
4 Deed dated May 14, 1959 and recorded August 17, 1959 in Book D573 at Page 537,  
5 Official Records of said County.

6

7 PARCEL 21

8

9 All those lands conveyed to the State of California by Rose Segale by Deed  
10 dated June 16, 1959 and recorded September 24, 1959 in Book D612 at Page 293,  
11 Official Records of said County.

12

13 PARCEL 22

14

15 All those lands conveyed to the State of California by the City of Los Angeles  
16 by Grant Deed dated April 17, 1959 and recorded September 22, 1959 in  
17 Book D609 at Page 712, Official Records of said County and by Quitclaim Deed  
18 dated January 26, 1961 and recorded April 15, 1961 in Book D1178 at page 907,  
19 Official Records of said County.

20

21 PARCEL 23

22

23 All right, title and interest to Sanchez Street between Arcadia Street and  
24 Plaza Street and to Plaza Street between Main Street and Los Angeles Street  
25 which the State of California may have acquired from Isabel J. Sepulveda Lugo,  
26 et al. by unrecorded Quitclaim Deed dated October 10, 1954.

27 ---

1 PARCEL 24

2

3 All those lands conveyed to the State of California by the Los Angeles  
4 Metropolitan Transit Authority by Grant Deed dated July 30, 1964 and recorded  
5 October 1, 1964 in Book D2647 at Page 939, Official Records of said County,  
6 and by Los Angeles Transit Lines by Quitclaim Deed dated June 1, 1955 and  
7 recorded October 21, 1955 in Book 49303, at Page 341, Official Records of said  
8 County.

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10 0-1545Q

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R/W No. 28001-514

State of California  
TO  
The City of Los Angeles

JOB TITLE Acquisition of El  
Pueblo de Los Angeles  
Historic Monument

NOT A STANDARD INSTRUMENT  
Checked as to parties, marital status, dates,  
natures, acknowledgments and corporate s

CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in real property conveyed by the within deed or grant to The City of Los Angeles, a municipal corporation, is hereby accepted under the authority of the City Council of The City of Los Angeles, pursuant to Ordinance No. 123655, approved January 23, 1963, and the grantee consents to the recordation thereof by its duly authorized officer.

Engineering  
Bureau of Right of Way and Land

By *[Signature]*  
TITLE OFFICER Title Officer.

Approved as to Authority FEB 8 1963  
Engineering

Bureau of Right of Way and Land

By *[Signature]*  
Authorized Officer  
TITLE OFFICER

By *[Signature]*  
TITLE OFFICER Principal Real Estate Agent.

Date: FEB 8 1963

Approved as to descriptions, 19

ROBERT S. HORII  
City Engineer.

By \_\_\_\_\_  
Deputy.

Approved as to form

\_\_\_\_\_, 19  
JAMES K. HAHN  
City Attorney.

By \_\_\_\_\_  
Deputy.

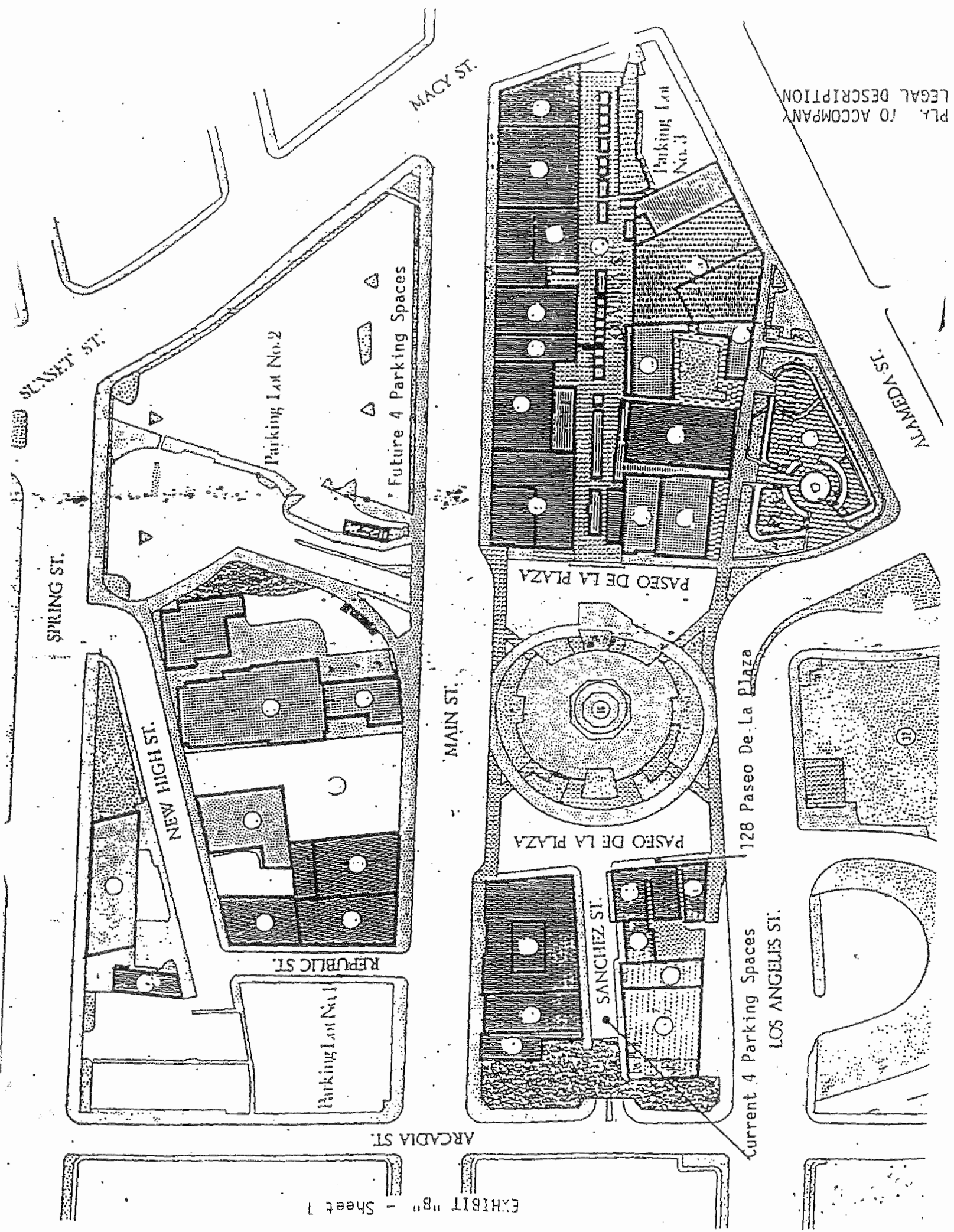
DO NOT WRITE ON THIS SIDE OF LINE. LEAVE FOR BINDING.

When Recorded Return to  
Director  
Bureau of Right of Way and Land  
DEPARTMENT OF PUBLIC WORKS  
City of Los Angeles

Division \_\_\_\_\_ Dist. \_\_\_\_\_  
Platted \_\_\_\_\_ D. M. 132A215, 132A213, 133.5A215  
By \_\_\_\_\_ C. E. \_\_\_\_\_  
Conditions \_\_\_\_\_ Escrow \_\_\_\_\_  
Signature \_\_\_\_\_ Date \_\_\_\_\_

Council File No. \_\_\_\_\_

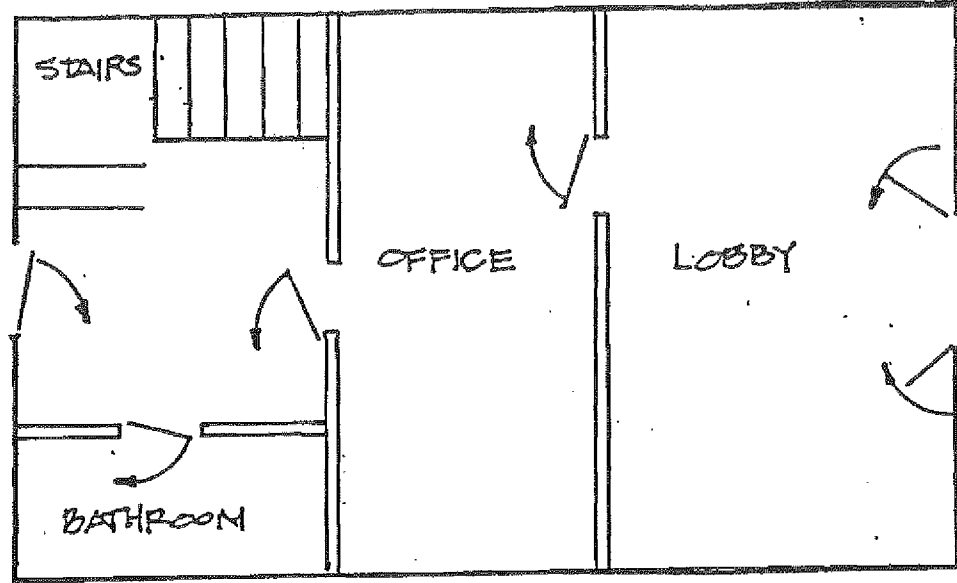




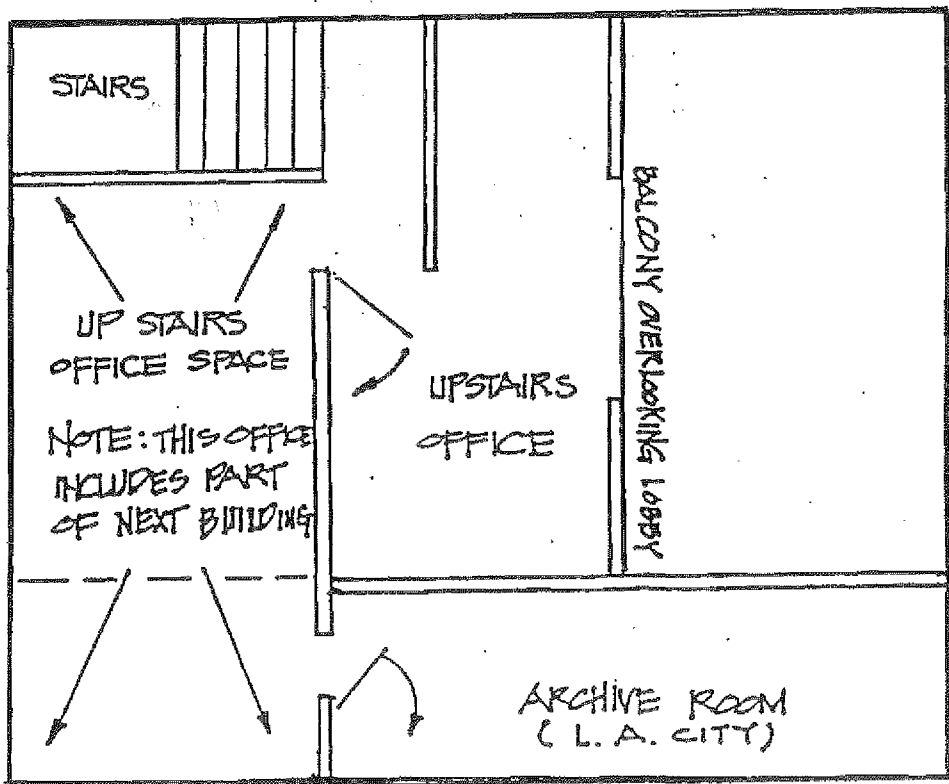
PLA TO ACCOMPAN  
LEGAL DESCRIPTION

EXHIBIT "B" - Sheet 1

EXHIBIT "B"  
Sheet 2



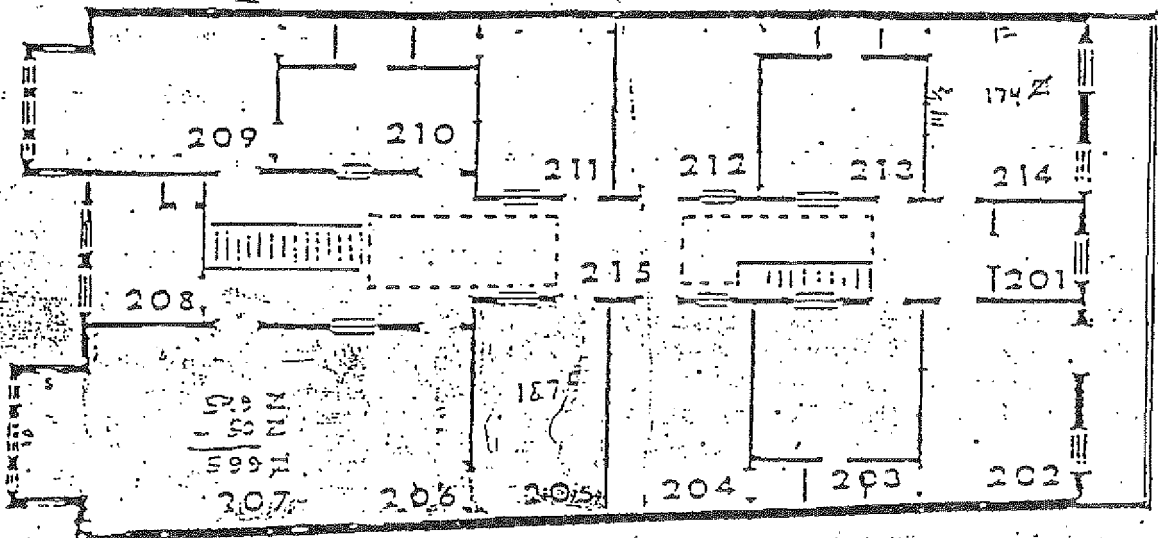
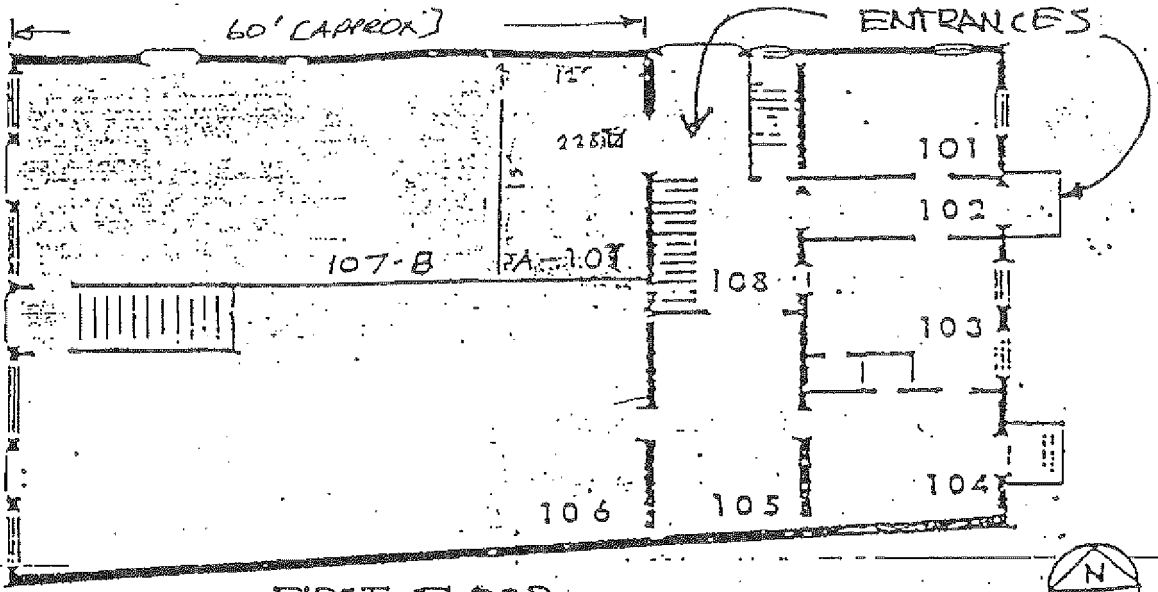
FIRST FLOOR



SECOND FLOOR

NORTH MAIN STREET

OLVERA STREET

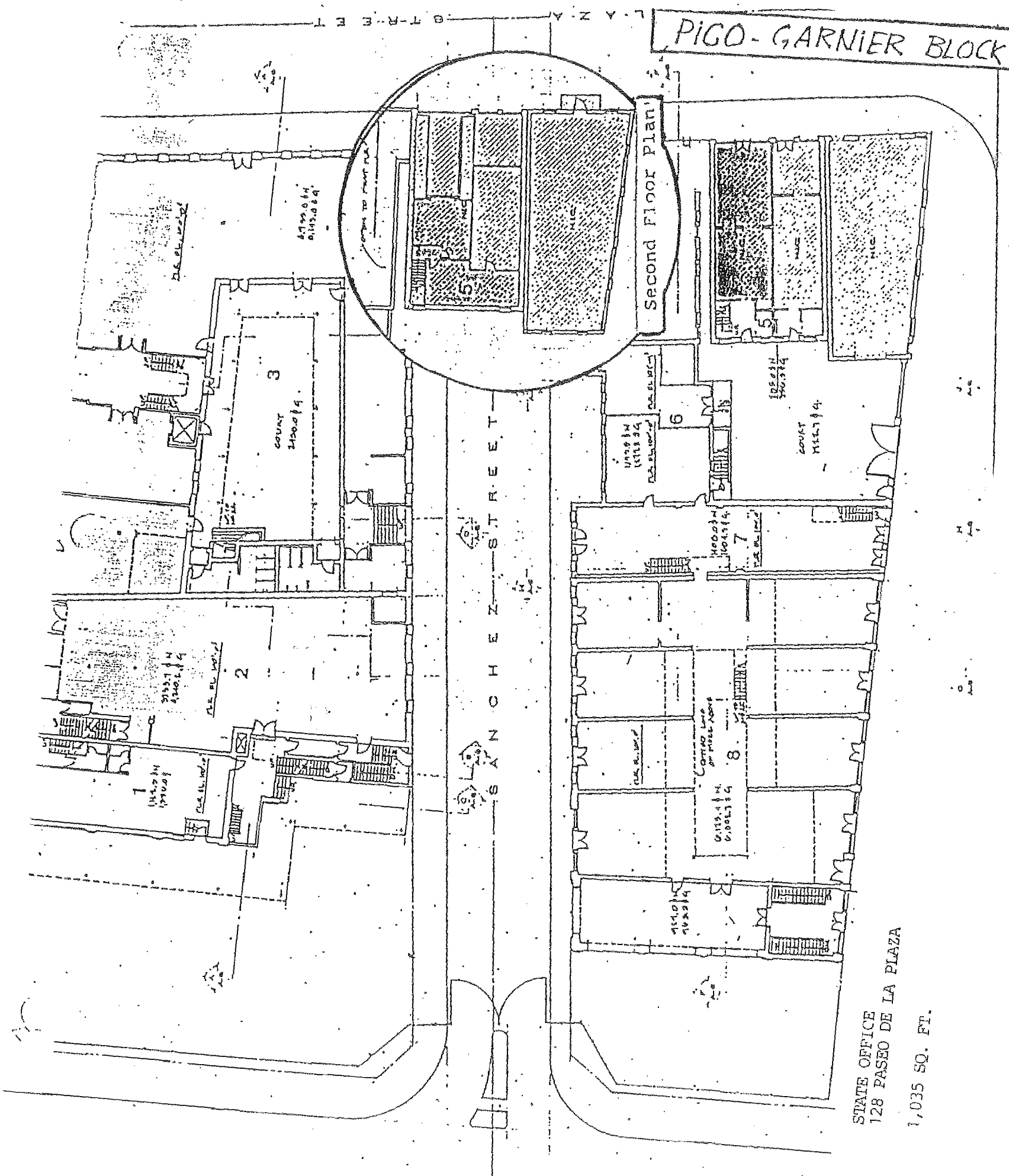


- |     |                                 |     |                       |
|-----|---------------------------------|-----|-----------------------|
| 101 | Weathering Exhibit              | 201 | Restroom Exhibit      |
| 102 | Hall                            | 202 | Business Officer      |
| 103 | Restroom (Display Room Exhibit) | 203 | Clerical              |
| 104 | Restroom (Display Room Exhibit) | 204 | EPPA & Clerical       |
| 105 | Weathering Exhibit              | 205 | Boarding Room Exhibit |
| 106 | Director's Office               | 206 | Gibbs Family Exhibit  |
| 107 | Display Room (General Store)    | 207 | Gibbs Family Exhibit  |
| 108 | Weathering Exhibit              | 208 | Director's Secretary  |
|     |                                 | 209 | Park Director         |
|     |                                 | 210 | Sequeiros Exhibit     |
|     |                                 | 211 | Administrative Assis  |
|     |                                 | 212 | Restrooms             |
|     |                                 | 213 | Clerical              |
|     |                                 | 214 | Accounting            |
|     |                                 | 215 | Restored Hall         |

CITY OFFICES  
OLVERA STREET

1,000 SQ. FT. (APPROX.)

# PICO-GARNIER BLOCK



STATE OFFICE  
128 PASEO DE LA PLAZA  
1,035 SQ. FT.

**From:** Steve Delgado <sdelgado@homeboyindustries.org>  
**Sent:** 1/18/2023 12:02:42 AM  
**To:** "LAART@metro.net" <LAART@metro.net>  
**Subject:** SCH#2020100007 Los Angeles Aerial Rapid Transit Project

Mr. Zelmer:

Please see the attached letter in response to the Draft Environmental Impact Report issued by your agency for the proposed gondola from Union Station to the Dodger Stadium parking lots.

Sincerely,  
Steve Delgado  
Chief Operating Officer  
Homeboy Industries  
130 W. Bruno St.  
Los Angeles, CA 90012



January 17, 2023

**VIA EMAIL**

Mr. Cory Zelmer  
Deputy Executive Officer  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Mail Stop 99-22-6  
Los Angeles, CA 90012

**Re: SCH #2020100007 Los Angeles Aerial Rapid Transit Project**

Dear Mr. Zelmer:

I am writing on behalf of Homeboy Industries in response to the Draft Environmental Impact Report (DEIR) issued by your agency for the proposed gondola from Union Station to the Dodger Stadium parking lots.

GO15-1

Homeboy Industries stands to be one of the most heavily impacted community stakeholders if the gondola is allowed to proceed as proposed. We will be affected with significant unmitigated environmental impacts during construction and by permanent effects on our operations.

GO15-2

We refer you to our letter to Metro dated November 16, 2020 for a detailed enumeration of our original concerns. While we concur generally with other community stakeholders in their current comments on the DEIR, we would like to point out the following areas of specific concern to Homeboy.

First of all, the document refers to Homeboy Industries as an "office building." The DEIR assesses potential environmental impacts against standards applicable to commercial structures. Homeboy Industries is, in fact, much more than an office; it is a highly-venerated, community-based non-profit that is the largest gang rehabilitation and re-entry program in the world. We provide training and support for thousands of formerly gang-involved and previously incarcerated people, allowing them to redirect their lives and become contributing members of our community.

GO15-3

**BOARD OF DIRECTORS**

- Pernille Spiers-Lopez, *Chair*
- Joe Argilagos
- Sean Arian
- Kelli Bernard
- Fr. Gregory Boyle, SJ
- Cecilia Cabello
- John Cusenza
- Troy Dawson
- Fr. Allan Deck, SJ
- Renee Delphin-Rodriguez
- Hilda Echeverria
- Jane Fonda
- Zac Guevara
- David Herbst
- Bruce Karatz
- Christine Lynch
- O'Malley Miller
- Rick Olivarez
- Ashley Palmer
- Wayne Ratkovich
- Viktor Rzeteljski
- Lupita Sanchez Cornejo
- Carlos Vasquez

**Emeriti Board Members**

- J. Michael Hennigan
- Rob Smith III

Hope has an address.

Many of our activities take place in and around our headquarters campus at 130 Bruno Street in Los Angeles. Any analyses of the potential impacts from the gondola should take into consideration the many community meetings, job training activities, spiritual counseling and other activities that take place at this location. It is truly a "sensitive receptor." In the near future we also hope to provide transitional housing for some of our clients on this site.

cont'd  
GO15-3

Following the outline of the DEIR, we note these areas of greatest concern:

**1. Project Description**

Because of the scale of drawings, it is difficult to ascertain whether the proposed project would require an aerial easement or easement buffer on Homeboy's current premises. Could you provide a larger scale drawing depicting where these zones might impinge.

GO15-4

**2. Hope Village - Housing & Service Expansion in Support of Alternatives to Incarceration**

Homeboy Industries is working to alleviate the housing crisis in Los Angeles and has plans to develop transitional and permanent supportive housing on land where the proposed Alpine Tower is located. Developing affordable housing and expanding our campus will support broader public and private partnerships to create "Hope Village" as an alternative to incarceration (ATI) anchored by a care first, jails last paradigm. Insofar as we can determine, the location of the gondola's Alpine Tower would significantly impair our ability to deliver housing to our clients and respond to the "State of Emergency" currently in place at the County and City levels in response to the homeless crisis; and serve as an impediment to "Hope Village" as a critical ATI strategy.

GO15-5

**3. Aesthetics**

Analyses in the DEIR of visual impacts from the gondola seem to completely ignore Homeboy Industries, which operates one of the key facilities in the gondola's path. There is no doubt that a 195-foot high, awkwardly-shaped concrete tower will have a serious and permanent - and most would say incompatible - visual effect on Homeboy Industries' operations. At the very least, your analysis of Landscape Unit 3 (page 3.1.22) should describe and discuss these impacts on Homeboy Industries in particular.

GO15-6

Further, most CEQA analyses include a Shade and Shadow study. One would be appropriate for this project as well.

GO15-7

**4. Noise and Vibration**

Analyses of these potential impacts correctly conclude that some significant impacts cannot be mitigated. We presume you will be seeking a Statement of Overriding Considerations to accept these impacts, at our expense.

With regard to noise, we are identified as NSR-7 in your analysis. We are projected to experience noise levels at 80.3 dBA during construction, 10.5 dBA higher than current ambient noise levels, described in your exhibit as sounding like a "garbage disposal at 3 feet." You deem this tolerable for an office building. As noted above, we conduct far more than just typical office activities, and invite many members of the public to our site. You note that even 75 dBA is "clearly unacceptable," even for office use, and that 65 dBA is "normally unacceptable" (page 3.13.48).

GO15-8

In the analyses of potential vibration impacts, Homeboy Industries is VSR-11, but is not called out as a Measurement Location. Therefore, no specific information about the impacts of drilling (or driving) 120-foot deep (sic) piles adjacent to our training rooms, kitchen and restaurant is provided. Nonetheless, the DEIR concludes that Homeboy Industries would experience significant “annoyance” from vibration, even with mitigation, during construction (page 3.13.63). A more detailed and site-specific analysis of the vibration impact on our buildings and operations would be appreciated.

GO15-9

### **5. Transportation**

Perhaps the largest credibility gap in the DEIR concerns automobile access and parking. It seems inconceivable that the proposed project would have no significant impact on either.

GO15-10

Clearly, potential construction period impacts would be manifold. We would like to see focused analyses of the impacts of proposed road closures on local streets including Alameda, Bruno, Alpine and Main.

GO15-11

Also, there is no explanation in the DEIR about where visitors to the gondola might park in our neighborhood and what the impact of moving “game day” traffic to Chinatown and its environs might cause. The traffic study in the DEIR seems purposefully oblivious to potentially severe impacts on automobile access, circulation and parking.

GO15-12

### **6. Impact on Our Business Revenue**

Homeboy Industries operates several social enterprises from its Bruno Street Campus including the Homegirl Café, Homeboy Merchandise, and the Homeboy Bakery. We rely on these businesses to create jobs for our clients and generate revenues in support of our mission. Each of these businesses are dependent on customer foot traffic and unimpeded vehicular access. For reasons aforementioned we have significant concerns regarding the revenue impact on our businesses.

GO15-13

### **7. Financing & Use of Public Funds**

We remain unclear as to how the gondola project will be financed, including the use of public funding to support the gondola’s construction. We will have significant concerns with any use of public funding that would defray resources from housing and other essential services for communities in need. As of the submission of this letter, transparency related to short and long term financing of the gondola project remains elusive.

GO15-14

### **8. Other Considerations**

In addition to these CEQA-related concerns, we would like to raise two additional points.

First, we are clearly concerned about the permanent effects that the gondola might have on our sensitive, human-serving operations at 130 Bruno Street and on our future growth – even on the viability of our operations at this location - if the project goes ahead as proposed. These longer-term operational and economic considerations should be discussed now, but the CEQA process may not be the best forum for resolving them.

GO15-15

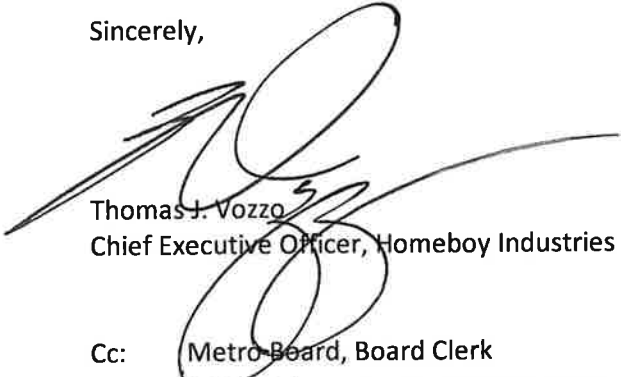
Second, there is a perception in our neighborhood that the gondola is being proposed as a precursor – “pre-mitigation” perhaps – to larger plans for development on the stadium parking lots. While these

GO15-16



plans are not in our purview to address now, we do believe that further development around the gondola end-station would exacerbate the environmental concerns we are considering at this time, and should be brought into play as part of this evaluation.

Sincerely,



Thomas J. Vozzo  
Chief Executive Officer, Homeboy Industries

Cc: Metro Board, Board Clerk  
Los Angeles City Mayor Karen Bass  
Fr. Gregory Boyle, Founder, Homeboy Industries  
California State Assembly Member Wendy Carrillo  
Steve Delgado, Chief Operating Officer, Homeboy Industries  
Los Angeles City Councilmember Eunisses Hernandez, City District 1  
Martha Jimenez, Executive Vice President/General Counsel, The California Endowment  
Dr. Robert Ross, CEO, The California Endowment  
California State Assembly Member Miguel Santiago  
Los Angeles County Board Supervisor Hilda Solis, County District 1  
Adrian Vasquez, District Director for Congressperson Jimmy Gomez  
Marisela Villar, District Director for Assembly Member Wendy Carrillo

**From:** Adrian Fine <afine@laconservancy.org>

**Sent:** 1/18/2023 12:18:27 AM

**To:** "LAART@metro.net" <LAART@metro.net>

**Subject:** LA Conservancy Comments, Draft Environmental Impact Report for the Los Angeles Aerial Rapid Transit Project (LA ART)

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (Draft EIR) for the Los Angeles Aerial Rapid Transit Project (LA ART). Please see attached.

Adrian Scott Fine  
Senior Director of Advocacy  
Los Angeles Conservancy  
afine@laconservancy.org<mailto:afine@laconservancy.org>

Pronouns: He / His / Him

Celebrate L.A.'s Legacy Businesses! Join us as the Conservancy explores legacy businesses throughout Los Angeles County, <https://www.laconservancy.org/curating-city-legacy-business>

[laconservancy.org](https://www.laconservancy.org/)<<https://www.laconservancy.org/>>  
E-News<<https://www.laconservancy.org/subscribe>> -  
Facebook<<https://www.facebook.com/laconservancy>> - Twitter<<https://twitter.com/laconservancy>> -  
Instagram<<http://instagram.com/laconservancy>>

Membership starts at just \$40  
Join the Conservancy today<<https://www.laconservancy.org/membership>>



**LOS ANGELES  
CONSERVANCY**

523 West Sixth Street, Suite 826  
Los Angeles, CA 90014

213 623 2489 OFFICE  
213 623 3909 FAX  
[laconservancy.org](http://laconservancy.org)

January 17, 2023

**Submitted Electronically**

Cory Zelmer  
Los Angeles County Metropolitan Transportation Authority  
One Gateway plaza, Mail Stop 99-22-6  
Los Angeles, CA 90012  
Email: [LAART@metro.net](mailto:LAART@metro.net)

**RE: Draft Environmental Impact Report for the Los Angeles  
Aerial Rapid Transit Project (LA ART)**

Dear Mr. Cory Zelmer:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Draft Environmental Impact Report (Draft EIR) for the proposed Los Angeles Aerial Rapid Transit (LA ART) Project. In reviewing this proposed Project, the Los Angeles Conservancy has serious concerns regarding its associated and cumulative impacts, both directly and indirectly. We strongly question the purpose and need for such an undertaking as there are environmentally superior alternatives readily available and appear to be dismissed without a clear substantiation.

GO16-1

The Conservancy raises concern about Metro serving as the lead agency for the California Environmental Quality Act (CEQA) process. It appears that the City of Los Angeles is better equipped and appropriate to serve in this role, and analyze potential impacts, conflicts, and identify project alternatives and appropriate mitigation measures. Lastly, we strongly question if there is a need for Federal review as a companion for this proposed undertaking, including Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the U.S. Department of Transportation Act.

GO16-2

GO16-3

If constructed, the LA ART Project would connect Los Angeles Union Station to Dodger Stadium property via an aerial gondola system. The proposed Project would include stations at Alameda and Cesar Chavez, the southernmost entrance to the Los Angeles State Historic Park, as well as at Dodger Stadium. The LA ART gondola system would be approximately 1.2 miles and consist of cables, three passenger stations, a non-passenger junction, towers, and gondola cabins.

GO16-4



**I. Purpose and need for LA ART is not fully demonstrated when environmentally superior alternatives are identified and available to be implemented**

The Draft EIR analysis does not make a compelling case for the purpose and need for this Project, especially given there are other alternatives that may achieve similar results, while minimizing and avoiding the adverse effects (both direct and indirect). The stated purpose for the proposed Project is to “improve mobility and accessibility for the region by providing a daily, high capacity aerial rapid transit (ART) service connecting the regional transit system at LAUS, Dodger Stadium, the Los Angeles State Historic Park, Elysian Park, and surrounding communities via three new transit stations.” However, the No Project Alternative and The Transportation Systems Management (TSM) Alternative are both found to be environmentally superior to the proposed LA ART Project.

GO16-5

Overall there are three project alternatives identified. These include a No Build Alternative, the Spring Street Alignment Alternative, and the TSM Alternative. The Spring Street Alignment is similar to the proposed project in that it will construct an aerial transit system. However, instead of a station at the southern end of Los Angeles State Historic Park, it would construct a station on the western edge boundary near Sotello Street. This alignment would have the same impacts as the proposed Project and therefore the Conservancy holds the same concerns.

GO16-6

The TSM Alternative would improve the already existing and popular Dodger Stadium Express (DSE) bus system, therefore requiring none of the aerial transit infrastructure. This alternative, as the environmentally superior alternative, would reduce all possible impacts tied to the construction and operation of an LA ART system.

GO16-7

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.”<sup>1</sup> 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.”<sup>2</sup> 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.<sup>3</sup> Reasonable alternatives must be considered “even if they substantially impede the project or are more costly.”<sup>4</sup> Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.<sup>5</sup>

GO16-8

Despite the analysis’ failure to explore an electric bus system the TSM remains the environmentally superior alternative. It is likely that new regulations in the coming years will require electric bus systems allowing the TSM to meet the zero emissions goals for Project Objectives 5 and 12. We believe an enhanced bus route, especially on non-event days would better serve the surrounding

<sup>1</sup>Public Resource Code, Sec. 21001 (b), (c).

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

<sup>3</sup> Guideline § 15126.6(a).

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

<sup>5</sup> Public Resources Code § 21081.5.

FN GO16-8



neighborhoods and Elysian Park and therefore meet Objective 9. A more robust DSE is likely to resolve many last mile dilemmas for nearby residents and visitors.

The existing DSE is an incredible resource for Dodger fans, shuttling thousands of fans each game. The system is limited in its current ability to attract more fans because the route is underserved and busses are often packed to maximum capacity. Enhancing the system through the TSM Alternative, by offering more frequent departures and a zero emission fleet, would attract many more riders on event days and beyond. Additional stops during non-event periods provide greater access to Elysian Park and would further benefit the community by providing a more equitable mode of access.

cont'd  
GO16-8

## II. Historic and cultural resources and view sheds will be impacted and irreparably harmed by the LA ART Project

A visual intrusion as a result of the proposed project is clearly evident. If built, the LA ART will be clearly visible and obscure the view, setting, and future overall experience of various historic places and spaces, including Union Station, El Pueblo, Los Angeles State Historic Park, and Chinatown.

The Conservancy disagrees believes the proposed project would have significant impacts to numerous historic resources by altering their historic settings and overall feeling. At the southern terminus of the project, the proposed Alameda Station would significantly impact both Union Station and El Pueblo's historic setting and feeling. One of the most important character defining features of Union Station are the views of its primary façade along Alameda. As metro is aware, Union Station is the last major railroad station to be built in the United States. Its gardens and patios have welcomed countless travelers to sunny California for nearly a century. In 1972, the City of Los Angeles designated Union Station Historic-Cultural Monument #101 and it was added to the National Register of Historic Places in 1980.

GO16-9

The imposing new LA ART station along Alameda, with passenger plazas shown extending into the National Register and HCM boundaries, would dramatically alter the visitor's experience of Union Station when walking or driving south from Cesar Chavez Avenue as well as when exiting the station. Should the project be constructed, the current setting would no longer exist. Views of Union Station's iconic palm tree lined motor court and rising clock tower would be prematurely shrouded from the north. Alameda would go from an open airy corridor to one that compresses the passerby below a massive structure that crowds the existing relationship between Union Station and El Pueblo. It is argued that the Mosaic Apartments already contribute to the erasure of this view shed, however the LA ART Project only exacerbates and amplifies this by making the impact much worse and more impactful as it encroaches onto the Public Right-Of-Way. Metro previously proposed acquiring Mosaic property and developed plans to redevelop this site and restore the full view shed to Union Station; this Project would completely foreclose this future opportunity.

GO16-10

In 2015, when Metro approved the Connect US Action Plan, the restoration of the Forecourt and Esplanade improvements were contemplated, as a means to strengthen the connections and "front door" between Union Station, El Pueblo and Olvera Street. As we currently understand, this project is now on hold due to consideration of the proposed Project. Not only is this delay unfortunate, the LA ART station greatly undermines this opportunity and crowds the historic resources, greatly disrupting and indirectly interrupting the feeling and setting of these spaces and their relationships to one another. Further, queueing for the Alameda Station would occur within the planned Forecourt and Esplanade area and north of the Placita de Dolores, crowding these areas and again changing the

GO16-11



ways in which these historic, public spaces have been, currently are, and could be experienced in the future.

cont'd  
GO16-11

The renderings provided in the Draft EIR do not fully depict and illustrate the visual impacts of the proposed new station on Union Station. The siting of the renderings provided are from locations that appear to diminish them. In consultation with project team consultants, the Conservancy has requested additional renderings from various points along Alameda south of East Cesar E. Chavez Avenue, and as a pedestrian will experience leaving the primary entrance of the station and the expanse of the pedestrian plazas proposed on either side of Alameda. Due to the holidays and the deadline to comment on Draft EIR, these have not yet been provided and are not included in the draft EIR. If adequately illustrated and included in the EIR, the Conservancy believes the full range and visual impacts of the proposal station will be evident. These images should be modified and accurately depicted to show the full extent of the undertaking and impact on the broader community view shed.

GO16-12

The Los Angeles Plaza Historic District, better known as El Pueblo, is a collection of some of Los Angeles's earliest historic resources dating to 1818. In 1970, the Los Angeles Plaza Park was designated as Historic-Cultural Monument (HCM) #64 and initially listed on the National Register in 1972. As shown in project renderings, the Alameda station with its wires and gondolas would be visible from various locations within the historic district.

From within the historic Avila Adobe's courtyard, constructed in 1818 and the oldest extant building in the City, the new station stands looming overhead. The project team has stated that this view shed was already compromised by the One Gateway Plaza at Patsaouras Transit Plaza. However, this tower is not immediately adjacent to the adobe. Even with One Gateway Plaza in the far distance, visitors are allowed the ability to spatially visualize how the vista appeared at the time of its construction. Without question, the LA ART's Alameda's station's proximity and scale impact this historic site much more heavily than that of the tower roughly 1,500 feet away. Today's Avila Adobe successfully transports visitors to a time passed. With the new station, the Conservancy is confident that this would no longer be a possibility.

GO16-13

In Addition to the impacts at Avila Adobe, the project would be seen from other vantages including the north entrance to Olvera Street and from La Plaza. As stated previously, the station looming above the historic district would significantly impact the setting and feeling of Los Angeles's oldest historic built environment.

Overall, the Conservancy believe the various (sighting, proximity, signage, lighting, noise and construction) and cumulative (taken as a whole) impacts to the historic view shed, including greatly altering the feeling and setting of this historic area, are highly problematic and detrimental to the overall vitality of these historic resources. We believe this requires LA ART to reconsider other locations for placement of this station, and, more importantly, viable and environmentally superior project alternatives that do not require the need for this station nor LA ART as currently envisioned.

GO16-14



**III. Draft EIR does not adequately address the proposed use and transfer of public rights-of-way and lands, applicable general plans, permitted legal use, and is in conflict with Public Resources Code 5019.59**

As described in the Draft EIR, the project would construct towers on the Alpine Parcel and Alameda Triangle. The former parcel being owned by the City of Los Angeles and latter being a Public right-of-way. With tower footprints at approximately 900 square feet, construction would occur on a sizeable portion of the parcels. Further, queueing for the Alameda Station would require the permanent use of public spaces for private use, including the Placita de Dolores and Union Station’s planned Forecourt and Esplanade area.

GO16-15

The Conservancy is concerned about the use of publicly-owned parcels for private use, as detailed in the Draft EIR. We believe the project does not adequately describe the legal authority and process by which LA ART is required to attain such rights, and makes inaccurate assumptions that the City and other public entities would give up their rights to these pieces of land. When looking at the Alpine Parcel in particular, other uses such as housing would better suit this site. With close proximity to City services and employment opportunities, the site is a good candidate for new, affordable housing construction. Given the need for affordable housing and limited land by which to build, as detailed in the City of Los Angeles’ recently adopted Housing Element of the General Plan and stated Regional Housing Needs Assessment (RHNA) priorities, why then should the City give up this land for LA ART?

As mainly a new tourist attraction, LA ART will attract an influx of visitors that will impact the authentic, lived experience of these historic spaces and places, not just in the area of Union Station and El Pueblo, but also Chinatown and the Los Angeles State Historic Park. As part of this concern, the Conservancy also questions the wisdom, appropriateness, and process by which various public right-of-ways and lands are to be granted for permanent use (for stations, towers, air rights, and queuing) to a private LLC and undertaking of this type.

GO16-16

How will these specific decisions take place and when, and does Metro, the City of Los Angeles, and/or the State Park and Recreation Commission (SPRC) have the legal authority to grant this type of commercial use to a private LLC in all the proposed locations? Our understanding is this project scope does not conform to the General Plan for El Pueblo Los Angeles State Historic Park<sup>6</sup> nor the Los Angeles State Historic Park<sup>7</sup>. Specifically the statute for El Pueblo states, “[a]ny proposed demolition, alteration, or encroachment on historic structures must have approval from the State Department of Parks and Recreation.” Commercial, privately-built and operated uses are generally excluded from approved activities. Therefore, the Draft EIR fails to fully identify or address this land use conflict that appears to make the preferred Project infeasible if access to these public lands (a necessity to build the Project) is not granted.

GO16-17

The statute establishing the Los Angeles State Historic Park, for instance, is clear in stating exceptions in how private development can occur within the boundaries of the park, such as providing access, parking, sanitation, etc. Per the Draft EIR, the project would require an amendment to the State Historic Park General Plan which does not currently allow for transit on its grounds or within its air rights. The amendment would use “access” as defined in PRC 5019.59 to

FN GO16-16

<sup>6</sup> Public Resources Code § 5002.2.  
<sup>7</sup> Public Resources Code § 5019.50; 5019.59;



justify said amendment. However, the proposed private-public operating agreement would limit operation to “as needed” when no events at Dodger Stadium are being held. Therefore the proposed agreement offers no definitive access to the park beyond scheduled Dodger Stadium events.

cont'd  
GO16-17

Because there is no guarantee that the gondola will run on days when no events are held at the stadium, the SPRC is not likely to and should not approve the amendment. With a combined land and air use of over an acre, the SPRC would be giving up a sizeable piece of the Historic Park’s property to the project

To reiterate, claims stating the LA ART Project will provide critical public access (thus allowing the construction of towers and a station within the park and on park lands) is not substantiated within the Draft EIR. Detailed analysis is not provided that states a clear or reliable level of service (Draft EIR states “based on demand” and “as needed”) that will be provided in the future vs. only on game or special event days. The Draft EIR suggests limited access from a privately funded and operated LLC warrants the removal of public park lands. The Conservancy disagrees, and would like to see greater documentation and evidence provided to the public that can support the Draft EIRs conclusions on this issue.

GO16-18

**IV. Should the proposed project anticipate federal funding, Section 106 and Section 4(f) would be triggered and additional environmental review would be required**

The Conservancy would appreciate greater clarity regarding the funding of this project. Particularly, if any federal dollars will be used in any way for LA ART’s planning, development or construction. Should the applicant or lead agency access funding from these entities, the project would trigger Section 106 of the National Historic Preservation Act (NHPA) and Section 4(f) of the Department of Transportation Act. Generally federal environmental review occurs in tandem with CEQA reviews.

Section 106 of the NHPA requires federal agencies to consider the impact of their actions on historic resources. Because of this section, public agencies must assume responsibility for the consequences of their actions on historic resources and be publicly accountable for their decisions.

Furthermore, Section 4(f) states:

GO16-19

“The Secretary shall not approve any program or project which requires the use of any land from a public park, recreation area, wildlife and waterfowl refuge, or historic site unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park, recreational area, wildlife and waterfowl refuge, or historic site resulting from such use.”

Given the projected ridership, size of the station platforms, extension into the Union Station parking lot, and use of Los Angeles State Historic Park property for the Chinatown/State Park Station, it is foreseeable that additional government funds and those at the federal level will be accessed. Additionally, the Union Station forecourt and esplanade project, located in the same vicinity as the Alameda Station, had previously been granted federal funding for the future project. Should that funding contribute to the pedestrian plazas for the station in any way, it would trigger the above code sections and need for federal environmental review.



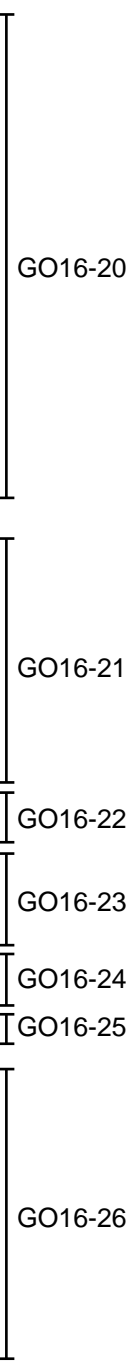


**V. Transfer CEQA lead agency authority to the City of Los Angeles**

The LA Conservancy believes the City of Los Angeles is better suited to serve as the Project’s lead agency. As planned, the City of Los Angeles would be responsible for granting the majority of the Project’s discretionary and ministerial permits and therefore is better suited for the lead agency role.

As shown in the Draft EIR, the 1.2 mile long Project is to be built and operated predominately on or above the City’s public right-of-ways. Furthermore, the plan states that the private LLC developer would enter into a public-private operating agreement with the City of Los Angeles.

Given the numerous historic resources in the area, the City of Los Angeles is better equipped to evaluate impacts and conflicts, including those on historic resources for which is assigned the primary jurisdiction, such as El Pueblo and various Historic-Cultural Monuments (HCM). As previously stated, the historic resources within the project area are some of the oldest and most important within the City. Therefore, a lead agency with this experience is more appropriate.



**VI. Conclusion**

The Conservancy has serious concerns regarding the construction and operation of the proposed LA ART project. To state again, we raise the following concerns regarding the Draft EIR and the proposed Project:

- I. Purpose and need for LA ART is not fully demonstrated when environmentally superior alternatives are identified and available to be implemented
- II. Historic and cultural resources and view sheds will be impacted and irreparably harmed by the LA ART Project
- III. Draft EIR does not adequately address the proposed use and transfer of Public rights-of-way and lands and their permitted legal use, and is in conflict with Public Resources Code 5019.59
- IV. Should the proposed project anticipate federal funding, Section 106 and Section 4(f) would be triggered and additional environmental review would be required
- V. Transfer CEQA lead agency authority to the City of Los Angeles

**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](mailto:afine@laconservancy.org) should you have any questions or concerns.



Sincerely,



Adrian Scott Fine  
Senior Director of Advocacy

cc: Supervisor Hilda L Solis  
Office of Mayor Karen Bass  
Council District 1, Eunisses Hernandez  
City of Los Angeles, Department of City Planning, Office of Historic Resources



The Old Warehouse. This five-story concrete building was originally constructed with an east-west axis in 1924 for use as a laboratory by the Brunswig drug company. Acquired by the Los Angeles County in 1930 its axis was changed to the north-south direction when Spring Street was widened. It is currently used by the County as a center for Indo-Chinese refugees and other purposes.

#### The Plaza and the East Side

- (Bldg. #43) Plaza probably laid out between 1825 and 1830 in a rectangular shape with the corners at the cardinal points of the compass. It was landscaped and the shape changed to a circle shortly after the Pico House was built. It has been relandscaped several times and is paved with brick and concrete. It contains a "kiosko" built in 1962 which houses restroom facilities. The plaza is owned by the city of Los Angeles.
- (Bldg. #46) Father Serra Park, on the east side of the Plaza is at the site of the old Lugo House (razed in 1951); contains lawns, trees, shrubs, and a statue of Father Serra.
- (Bldg. #47) Placita de Dolores, 1979, a triangular lot containing a semi-circular tiled mural depicting "El Grito", a stage and a replica of the Bell of Dolores. Owned by the Department of Public Works, it was constructed on top of the old Zanja Madre.

A significant aspect of the cultural resources of El Pueblo exists as subsurface archeological remains. These values have not been systematically explored for the entire park; however, archeological excavations near the Avila Adobe and in other areas have revealed that significant remains are present. Such remains may be expected to include at least the following: foundation or structural remains from the span of history of the pueblo; remains of the Zanja Madre and other utility-related features; early road surfaces; and artifacts discarded as debris around older structure or over the bluff known to have existed along present-day Los Angeles Street.

Recent restoration work associated with archeological investigations along the foundations of older structures, and development work near the Biscailuz Building, indicate that such materials do exist, and are probably distributed throughout the historic park. Test excavations have been done recently in the area of El Pueblo Parking Lot #1; these have also revealed significant resources. Based on the investigations, it is clear that significant cultural resources are to be found below the surface.

#### Natural and Scenic Values

The natural resources of El Pueblo consist entirely of plant and animal species introduced after the appearance of Euroamericans and the founding of the pueblo. Thus, no native species exist today, except for some plants in the Avila Adobe patio, introduced for interpretive purposes. The most predominant of the exotic forms present are the large Moreton Bay fig trees (Ficus macrophylla), planted ca. 1877 in the Plaza. Ornamental shrubs and trees are interspersed in parking lots and next to structures. Some garden species are regularly planted in the courtyard of the Avila Adobe. Besides the usual urban assortment of pigeons and house sparrows, the very rare grey ring-necked dove occurs in the park. This bird is found only in Florida and on Olvera Street, in the United States.

The park was originally part of the Southern Oak Woodland biotic community, although the congested urban environment of which El Pueblo is a part has long since supplanted this community. The only natural element left is the climate, although today's weather conditions have been modified by persistent atmospheric pollution.

El Pueblo possesses some scenic values. The taller structures of the Pico-Garnier Block are easily visible landmarks from the surrounding surface streets; the Pico House (a hotel) is probably the most notable. The plaza area presents a green relief from the surrounding grey of government buildings and freeways. In the historic park, both Olvera Street and the Pico-Garnier Block can be appreciated from the vantage of the Plaza. For many, the stalls and shops of Olvera Street present a colorful and bustling scene. Many areas of the park, however, are not visible from the outside. The Main Street side of the Olvera Street block presents a blank wall, relieved only by the ornamental facade of the Sepulveda House.

### Recreation

El Pueblo de Los Angeles SHP offers many forms of recreational activities. The park offers yearly cultural events, including: Mardi Gras; The Blessing of the Animals; Cinco de Mayo festivities; a summer concert series in the Plaza; celebration of the city's birthday in September; and La Posadas, a nine-day celebration preceding Christmas. Numerous other events dot the yearly calendar, as well as special "once-only" events. "Las Angelitas del Pueblo," an active support group, offers guided walking tours of the historic park, Tuesday through Saturday.

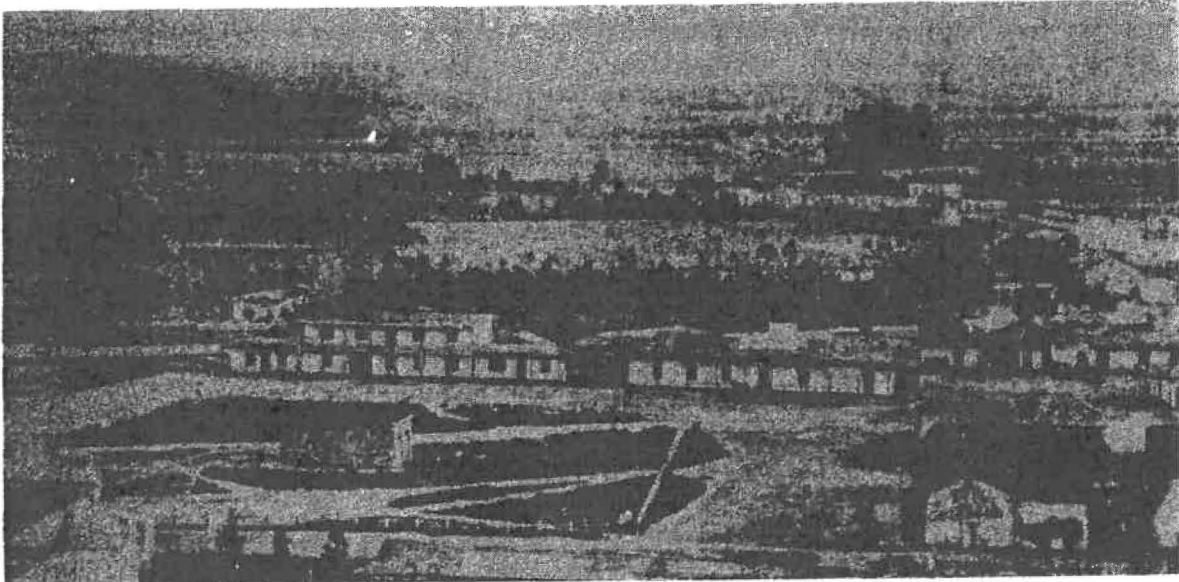
Additional activities that can be considered recreational revolve around the daily activities of the park. The shops and puestos (stalls) along Olvera Street offer a chance for visitors to take leisurely strolls. This is often combined with lunch or dinner at one of the many restaurants along the street. Bands often play in the Plaza at the noon hour, and many visitors relax there.

### Resource Relationships to the Environment

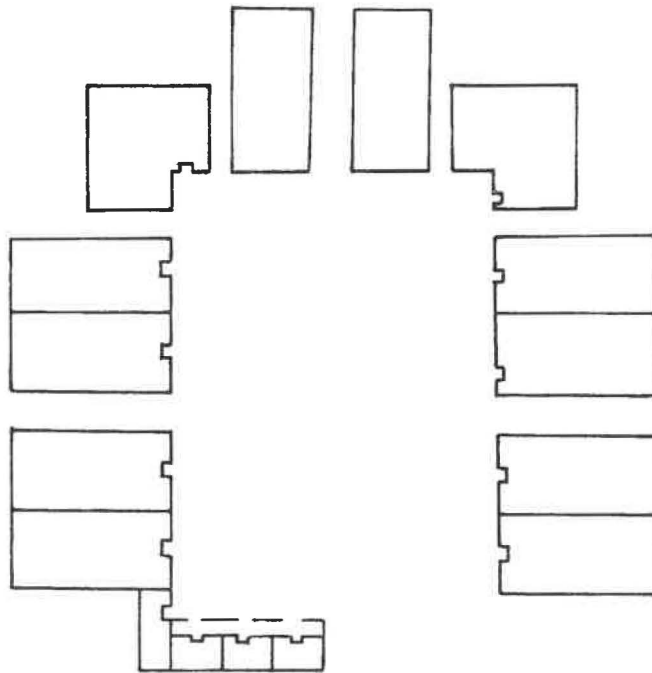
The resources of El Pueblo de Los Angeles SHP are inextricable from the busy urban environment which surrounds them. This has affected, and will continue to affect, management and interpretation of these important resources. The presence of downtown Los Angeles is inescapable in most areas of the unit. The horizon to the south is dotted with massive government structures, and busy thoroughfares surround and divide the unit, with the attendant problems of noise and atmospheric pollution. As a result, the boundaries of the historic park are all but unrecognizable to first-time visitors, and the specter of parking and crossing the busy streets may discourage some visitor use.

The location of the park has many positive aspects. The presence of surface streets and freeways makes it easily accessible from anywhere in the Los Angeles basin. The unit is convenient to pedestrians from the government buildings to the south, and has traditionally been a favorite spot for lunch. The park, especially the Plaza and Olvera Street, presents a relief from the surrounding landscape.

At present, it does not appear that the surrounding environment presents an imminent threat to the historic structures. Several conditions will, however, have to be considered and monitored in the future. Traffic and vibration may, to some degree, affect the structures. Weather conditions and smog may affect the integrity of some building exteriors and the remains of the Siqueiros mural. Historic buildings also face the danger of earthquake damage.



*Plaza - 1857, showing the Lugo House Adobe and other buildings surrounding the Plaza before major changes took place (background is site of Union Station)*



*Derived from a map of the suggested plan of the first plaza. On file, H. H. Bancroft Collection, Bancroft Library, Berkeley.*

## Resource Deficiencies and Recommendations

Certain phases of El Pueblo's historical span are poorly represented in the park. This is partially acceptable, since it would be infeasible to interpret, in depth, the entire historic period. In some instances, however, these deficiencies should be corrected by augmenting the present resources of the park through state acquisition, or transfer of jurisdiction of adjacent parcels of land (see Figure 1). Specifically, these theme-related deficiencies and possible corrective measures are:

Early Hispanic (Spanish) Era. El Pueblo de Los Angeles (1781) is the second of only three official pueblos established by the Spanish in Alta California. Although it has been at its present location only since about 1818,<sup>1</sup> the site relates significantly to the Early Spanish period. This period is physically represented by the Avila Adobe, the church, and the site of the Plaza, although the latter two have been heavily altered through the years, and are not state-owned.

It is important, therefore, to make every effort to augment the resources of this era. Specifically, increased archival research should be ongoing for the era. A comprehensive archeological recovery program must be instituted and applied at every opportunity, throughout the park. Equal consideration must be given to reconstruction of period adobe structures wherever an appropriate lot becomes available.

Late Hispanic (Mexican) Era. This period (1822-1848) was an important one in the pueblo, and to California as well. It was a time of turmoil, when Mexico broke away from Spain and imposed new regulations on the colony of California. It was an important period of development in El Pueblo. Unfortunately, only two structures have survived from this period, the Avila Adobe and the church, both built in the earlier (Spanish) period. Measures similar to those outlined above must be undertaken to correct these deficiencies.

American Era. This historical period (1848-present) is well represented, especially the span from 1850 to 1900. The physical resources of this period dominate all others in the park. Some significant structures that lie outside state ownership, yet within the ultimate boundary, need to be acquired to ensure adequate interpretation and rehabilitation. Specifically, these include the Vickery- Brunswig and Plaza House structures. A significant problem is the lack of knowledge concerning historical ethnic populations, which were very important to development of El Pueblo. Every effort must be made to acquire this understanding, through archival, oral historical, and archeological investigation.

<sup>1</sup> A plaza, near the location of the present one, was apparently laid out sometime after the intensive rains of 1815 forced relocation of the pueblo to higher ground from its original location in the nearby flood plain (see plan of first plaza, bottom of page 28). The actual layout of the relocated plaza may have occurred between 1815 and 1825 (cf. Appendix B). It is said that the pueblo's second plaza location (1814-1825) overlaps a portion of the third (and present) plaza--its northwestern corner. The third plaza may have been laid out by 1825-1830; it is known that the second plaza was abandoned by 1832. The 1818 date is used in the text, and for the initial date of the park's "prime period," as a convenience, because the date that is being generally accepted for construction of the Avila Adobe (the earliest state-owned structure in the historic park) is 1818. Contrary to what many believe, early Alta California settlements were informal, in contrast to the inset of the planned plaza; in fact, Sola, in an 1818 communication, complained of the "casual" arrangements of the Los Angeles and San Jose pueblos (Mason, 1979: personal communications).

### Allowable Use Intensity

All areas now within El Pueblo de Los Angeles SHP will sustain high use intensity, assuming that all currently existing hazards associated with unstabilized or unrestored structures are corrected. It is conceivable that some restrictions might be placed on particular structures, based on local health and safety regulations or on the needs of specific structures or other resources.

### Theme Identification

The California History Plan has identified the major themes and periods of California history. El Pueblo de Los Angeles SHP contains elements that represent two major eras (Hispanic and American), as well as suberas, themes, and subthemes.

The park, when viewed as an archeological site, represents aspects of the Hispanic Era, including both the Spanish and Mexican suberas. Specifically, the Avila Adobe, the Plaza, and the church were established before ca. 1825. Also, many areas in the park were initially developed during the Mexican subera, including many adobe structures located around the Plaza. Although these structures are not standing, their locations may yield significant archeological resources.

Construction and development boomed around the Plaza, and in the surrounding area as well, during the American Era. Many of the historic structures now in the park are dated from the period 1850 to 1900. All of the Pico-Garnier block falls roughly in this period, as do many of the buildings along Olvera Street. An important component of this period is the general development of the Los Angeles urban area, as it is reflected in El Pueblo. This development was accompanied by a change in the national and ethnic population of the area. A large Chinese population occupied buildings on all but the west side of the Plaza. Many other national groups are represented by residences and businesses throughout the pueblo area.

Many resources in the park reflect the later period of the American Era. After 1900, El Pueblo began to decline; by the 1920s, it could be characterized only as a slum. Some construction did take place, however, along Olvera Street and next to the Plaza. The Biscailuz Building (1926), the Methodist Church (1926), and the Plaza Substation (1904), which served the urban electric railway system, are from this period. One of the most significant resources of El Pueblo is David Alfaro Siqueiros' mural, Tropical America, painted in 1932 on the south face of the second story of the Italian Hall. Although this work was condemned at the time and the wall whitewashed, remnants of the mural are visible from many areas of the park.

In summary, the resources of El Pueblo represent a significant span of California history. The park contains resources worthy of preservation and interpretation that date from 1818 to 1932.

### Theme Statements

Numerous themes and subthemes identified in the California History Plan are represented at El Pueblo. Within the Spanish period of the Hispanic Era, applicable themes include: Spanish exploration and settlement; political and religious affairs, specifically colonization; and economic and material growth, specifically agriculture, adobe architecture, and energy and water transmission. For the Mexican period of the Hispanic Era, the following themes are pertinent: military affairs; economic and material growth, specifically agriculture and architecture; and social history, including lifestyles and recreation.

Themes relevant during the American Era include: political and military affairs; economic and material growth; population growth and patterns; transportation; architecture, including adobe, Victorian, and later styles; cultural development, especially drama; and social history, with an emphasis on ethnic populations and interethnic relations.

These themes are more fully delineated in the Interpretive Prospectus. The prospectus and this general Plan will serve as guides for development of an interpretive plan for El Pueblo.

The following table lists the specific interpretive periods and themes that were derived from the Interpretive Prospectus. These are divided into primary and secondary interpretive categories.

Table 1

INTERPRETIVE PERIODS AND THEMES

Primary Interpretive Periods

1818 - 1822	Spanish Period
1822 - 1848	Mexican Period
1848 - 1932	American Period

Secondary Interpretive Periods

	Pre-history - Indian Lifestyles
1781 - 1818	Pueblo Founding; First Plaza
1932 - Present	Recent History

Primary Interpretive Themes

- El Pueblo De Los Angeles - Then and Now
  - Settlement
  - Religion
  - Agriculture
  - Energy and Water Transmission
  - Political
  - Commerce and Trade
  - Social History
  - Military Affairs
  - Ethnic populations
  - Christine Sterling
  - Recent History

Secondary Interpretive Themes

- Native Americans
- Portola Expedition
- San Gabriel Mission
- People Important to El Pueblo



## Declaration of Resource Management Policy

### Preservation, Restoration and Reconstruction of Cultural Values

Maintenance of the historical resources at El Pueblo through preservation, restoration, and reconstruction is the most important aspect of development in the park. Most resources in the park are historic structures, and the sites of past structures of historic importance. Resource Management Directive #64 creates guidelines for this work:

"AS FAR AS POSSIBLE, HISTORIC FEATURES IN HISTORICAL UNITS, OR IN HISTORICAL ZONES OF OTHER UNITS, SHALL INCLUDE ALL PHYSICAL EVIDENCES OF SIGNIFICANT HUMAN ACTIVITY AT THE SITES AND BE DEALT WITH AS FOLLOWS:

- a. WHEN STRUCTURES OR OTHER FEATURES OF HUMAN ORIGIN ARE INCLUDED IN A HISTORICAL PRESENTATION, IT IS THE DEPARTMENT'S OBJECTIVE: FIRST, TO PRESERVE WHAT EXISTS: SECOND, TO RESTORE WHAT EXISTS: THIRD, TO RECONSTRUCT ON ORIGINAL SITES: AND FOURTH, TO RECONSTRUCT ON OTHER THAN ORIGINAL SITES. NO RESTORATION OR RECONSTRUCTION SHALL BE UNDERTAKEN UNLESS THERE IS SUFFICIENT INFORMATION TO ASSURE ACCURATE AND AUTHENTIC WORK. IN EVERY CASE, SUFFICIENT HISTORICAL AND ARCHITECTURAL RESEARCH SHALL BE ACCOMPLISHED TO ESTABLISH ACCURACY AND AUTHENTICITY.
- b. EXISTING FEATURES OF HISTORICAL AGE WILL ALWAYS BE PRESERVED AND/OR RESTORED (1) UNLESS THEY ARE NOT HISTORICALLY IMPORTANT WITHIN THE PRIMARY PERIOD FOR THE UNIT; (2) UNLESS THEY OCCUPY SITES REQUIRED FOR RECONSTRUCTION OF OTHER FEATURES OF OVERRIDING IMPORTANCE IN INTERPRETATION OF THE UNIT; (3) UNLESS THEY EXERT A NEGATIVE INFLUENCE ON THE UNITS, AND SHOULD BE REMOVED.
- c. FOR HISTORIC FEATURES THAT FALL WITHIN THE PRIMARY PERIOD OF A UNIT, AND ARE IMPORTANT FOR PRESENTATION AND INTERPRETATION, THE DEPARTMENT SHALL PRESERVE, RESTORE, OR RECONSTRUCT, AS MAY BE NECESSARY.
- d. FOR EXISTING HISTORIC FEATURES OUTSIDE THE PRIMARY PERIOD FOR A UNIT, THE DEPARTMENT SHALL PRESERVE, AND RESTORE AS REQUIRED TO PRESERVE, BUT WILL NOT RECONSTRUCT.

In accordance with these guidelines, all structures constructed during the prime period (1818-1932) shall be preserved. These structures will be stabilized where necessary, to preserve the integrity of the resources. Such work has been ongoing in some areas of the park, notably on the Pico-Garnier Block and the Avila Adobe on Olvera Street. In other areas of the park, structures have not been dealt with; in these areas, stabilization action will be taken. Particularly important are: The Sepulveda House; the Pelanconi House; the Plaza Substation; and other structures along the northwest side of Olvera Street.

Restoration will be necessary in many structures in the park, both for purposes of stabilization and to reestablish historical authenticity with respect to the prime period. Almost all of the buildings have been modified since the time of their construction, and a decision regarding the prime period for each structure will have to be made before restoration work. This period shall reflect the date of construction and/or the period when the structure reached the ultimate expression of its purpose. For example, the Pico House, constructed in 1869, may be said to have reached its zenith in ca. 1875-6. Thus, this later date may, in fact, be the best guide for restoration work, leading to the fullest possible interpretation of the place of the building in the history of the area. Such a decision will be made for each structure when restoration begins, based on more indepth research to be guided by the information in this plan.

All restoration work shall follow the above-listed guidelines of the department. Historical authenticity shall be sought on exterior restorations. Authenticity shall be sought on any interior restorations that will be open for public viewing, or that will serve any public function, such as museum facilities, support group facilities, or office space. Interior adaptive use restorations shall conform to the period emphasized in the exterior restoration of any building. Thus, no single structure shall be used to represent multiple periods, but rather shall be preserved, restored, and interpreted as a whole, with internal integrity in respect to theme and period.

Extensive archival and other historical research shall be done before restoration work, to insure complete accuracy. These endeavors shall be oriented toward gathering information on the architectural styles, as well as the history of the uses of the buildings. This information shall form the basis of the interpretive efforts undertaken in each structure.

Serious consideration shall be given to reconstruction of specific buildings in the park. Reconstructions offer the opportunity to mitigate resource deficiencies in reference to specific historical periods. Priority shall be given to reconstruction of adobe buildings from the Spanish and Mexican periods. These reconstructions shall be based on complete historical and archeological research, and shall not proceed until a sufficient body of information regarding the structures has been compiled. In all reconstructions, complete authenticity shall be sought. Reconstructions shall take place on the original building sites, whenever possible.

Generic or period structures that do not reflect actual dwellings that existed shall not be acceptable. Reconstructions shall occur on property that is currently occupied by structures outside the primary historical period, and/or on unoccupied land.

Historical archeology shall be employed wherever necessary to ensure the authenticity of restoration and reconstruction work. Archeological testing and monitoring shall also be employed whenever surface or subsurface disturbance associated with any work in the unit occurs, as delineated in Resource Management Directive 59. Any proposed demolition, alteration, or encroachment on historic structures must have approval from the State Department of Parks and Recreation.

### Objectives for Interpretation

In accordance with the approved Declaration of Purpose, interpretation at El Pueblo shall emphasize history during the prime period, 1818-1932, but shall also include the flow of history from the Hispanic Era to the present, so as to depict the diverse populations of the area and the development of Los Angeles. Efforts will concentrate on general themes from the California History Plan that pertain to El Pueblo. Specific themes and methods of interpretation shall be determined by this plan and the Interpretive Prospectus.

### Interpretation of Cultural Values

The department is committed to communicating to park visitors the historical significance of El Pueblo, and the history of Los Angeles from its founding in 1781 to the present. This must be done with a well-planned interpretive program that will provide continuity for the flow of history from the Spanish era through the Mexican and American eras, and will act as a strong unifier of the diverse facilities offered at El Pueblo.

Activities such as concessions, house museums, interpretive displays, tours, and special events will be appropriate to the historical integrity of the park, and will contribute to visitor enrichment and understanding of the resources of El Pueblo.

### Adaptive Use

While the department seeks historical authenticity in state historic parks, it is recognized that from time to time, visitor services must be provided through concessions. In the case of historical parks, adaptive use in the historic preservationist's sense is an appropriate means of providing visitor services. Such use is covered in part by Resource Management Directive 68, which states:

"BUSINESSES ESTABLISHED UNDER CONCESSION AGREEMENTS IN HISTORIC STRUCTURES COMMITTED TO AUTHENTIC PRESENTATIONS MUST BE COMPATIBLE WITH THOSE BUSINESSES THAT OCCUPIED THE STRUCTURES DURING THE HISTORIC PERIOD, AND MUST BE CONSISTENT WITH THE APPLICABLE RESOURCE ELEMENTS..."

El Pueblo offers an unique opportunity to interpret the story of the development of a city. This interpretation shall include the facts associated with the founding of the pueblo and the events of the Hispanic and American Eras, and shall impart to the public, wherever possible, a deeper sense of the relationship between events, and a concept of the flow of history. It is important that the public understand that the events, and especially the cosmopolitan makeup of the population of El Pueblo, are exemplary of the development of the City of Los Angeles. This emphasis will heighten the awareness of the citizens of Los Angeles, and will allow visitors a broader understanding of the processes of urbanization.

**From:** LA Union Station HS <laushs@earthlink.net>

**Sent:** 1/18/2023 12:56:59 AM

**To:** laart@metro.net

**Subject:** Comments against LAART's Gondola Project and Cathedral High School Meeting

Dear Mr. Zelmer,

Incidentally, Metro records show that the LAART related meeting at Cathedral High School took place on January 12, 2023.

Respectfully,

Thomas R. Savio  
Executive Director, LAUSHS