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Submitted Electronically

Los Angeles County Metropolitan Transportation Authority
Board Administration
One Gateway plaza, Mail Stop 99-3-1
Los Angeles, CA 90012
Email: BoardClerk@metro.net, LAART@metro.net

RE: Final Environmental Impact Report for the Los Angeles Aerial Rapid Transit Project (LA ART)

Dear Metro Board of Directors:

The Los Angeles Conservancy thanks Metro for the opportunity to comment on the Final Environmental Impact Report (Final EIR) for the proposed Los Angeles Aerial Rapid Transit (LA ART) Project. The Conservancy has raised concerns about the Project, namely its associated and cumulative impacts to historic resources in the Project area. 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 obstruct views from various locations within the historic district. Further, Alameda would go from an open airy corridor to one that compresses passersby below a massive structure that crowds and disrupts the existing relationship between Union Station and El Pueblo.

The Conservancy believes the various (sighting, proximity, signage, lighting, noise and construction) and cumulative impacts to the historic view shed at the proposed Alameda station, including greatly altering the feeling and setting of this historic area, are highly problematic and detrimental to the overall vitality of the historic resources in the Project area. **We believe this requires Metro and LA ART to reconsider other viable and environmentally superior project alternatives that do not require the need for the Alameda station nor LA ART as currently envisioned.**

To restate, the Conservancy has previously submitted the following, detailed concerns and recommendations 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; and
- IV. Should the proposed project anticipate federal funding, Section 106 and Section 4(f) would be triggered and additional environmental review would be required.

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) 430-4205 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
President and CEO

cc: Mayor Karen Bass, Chair
Supervisorial District 1, Hilda Solis
Council District 1, Eunisses Hernandez
City of Los Angeles, Department of City Planning, Office of Historic Resources

