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February 21, 2024

**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](mailto:BoardClerk@metro.net), [LAART@metro.net](mailto:LAART@metro.net)

**RE: AGAINST Item #12: Los Angeles Aerial Rapid Transit Project Environmental Impact Report (File No. 2023-0743) and FOR Item# 12.1 (File No. 2024-0132)**

Dear Metro Board of Directors:

The Los Angeles Conservancy thanks Metro for the opportunity to comment on the approval of the proposed Los Angeles Aerial Rapid Transit (LA ART) Project and certification of its Final Environmental Impact Report (EIR). We also thank Directors Solis, Bass, Dupont-Walker, Horvath, and Sandoval for their motion “Empowering Community Through an Inclusive Community Benefits Agreement,” which uplifts important historical and contemporary contexts and community concerns that must be acknowledged when considering this Project approval. We particularly appreciate Directive A, #8 which aims to develop and implement a community impact mitigation plan that addresses a variety of impacts, including visual impacts to Union Station’s historic architectural elements. We respectfully request this mitigation plan also address visual impacts to Los Angeles Plaza Park also known as El Pueblo and that this may include relocation of the Alameda Station to lessen the impacts to these two significant Los Angeles historic places.

To date, we have raised concerns about LA ART, namely its associated and cumulative impacts to historic resources in the Project area. One of the most important character-defining features of Union Station are the views of its primary façade along Alameda Street. 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. Across the street, 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 #64 and initially listed on the National Register of Historic Places 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 Street 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 (taken as a whole) impacts to the historic view shed in the vicinity of the proposed Alameda Station greatly alters the feeling and setting of this historic area. The location and massing of the Alameda Station are highly problematic and detrimental to the overall experience of significant historic places, including Union Station and Los Angeles Plaza Historic District.

**We do not support this project as currently proposed. We request Metro and LA ART relocate the Alameda Station further to the north closer to the Mosaic Apartments to lessen the impacts to Union Station and Los Angeles Plaza Historic District. Should a relocation of the Alameda Station not be feasible, we urge Metro 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](mailto:afine@laconservancy.org) should you have any questions or concerns.

Sincerely,



Adrian Scott Fine  
President and CEO

cc: Mayor Karen Bass, Chair



Janice Hahn, Vice Chair  
Fernando Dutra, 2<sup>nd</sup> Vice Chair  
Kathryn Barger  
James Butts  
Jacquelyn Dupont-Walker  
Lindsay Horvath  
Paul Krekorian  
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