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Sent Electronically

Mr. Cory Zelmer
Deputy Executive Director, Metro
One Gateway Plaza, Mail Stop 99-22-6
Los Angeles, CA 90012
Email: LAART@metro.net

RE: Notice of Preparation (NOP) for the Los Angeles Aerial Rapid Transit Project

Dear Mr. Zelmer:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Los Angeles Aerial Rapid Transit (LAART) Project Notice of Preparation (NOP). The proposed LAART Project would connect Los Angeles Union Station to Dodger Stadium via an aerial gondola system. The proposed project would serve as a replacement to the current shuttle system used during Dodger's baseball games. The proposed route would travel along Alameda Street, Spring Street, and Bishops Road with a platform located on Alameda Street and Dodger Stadium.

I. Significant and unavoidable impacts to historic resources will occur due to the proposed project

The Conservancy would like to better understand the proposed project as we believe it will likely result in significant indirect impacts to historic resources by impacting important viewsheds. With a proposed platform on Alameda, the Project will alter sightlines of Union Station as well as pedestrians within El Pueblo and Olvera Street.

As envisioned it appears the proposed Alameda platform will interrupt iconic views of Union Station and change its context. Simultaneously, construction of project infrastructure such as towers and wires to carry gondolas will most likely be visible from inside Olvera Street, thus changing the experience for tourists and patrons. A key component of the Olvera Street experience is the ability to be taken back in time. Gondolas overhead will change the feeling of this important attraction.



II. Alternatives to the proposed plan must be considered

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."¹ 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."² 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.³ Reasonable alternatives must be considered "even if they substantially impede the project or are more costly."⁴ Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁵

Because the aerial transit system will have significant indirect impacts on historic resources, Metro must consider all viable alternatives. Currently, the proposed plan has a single station proposed for Union Station, however, Metro should explore alternative siting and/or multiple locations for this station as a way to potentially reduce indirect impacts to historic resources.

III. Conclusion

The current proposal for the Los Angeles Aerial Rapid Tramway Project is planned for a location immediately adjacent to the heart of historic Los Angeles. We strongly encourage the Metro's project team to explore all viable alternative sites for the proposed Alameda Street platform as well as alternative routes to minimize and avoid impacts.

We welcome the continued opportunity to work with Metro staff and representatives to develop an outcome that will both provide Dodger fans with greater access to the stadium while also protecting historic viewsheds and existing experiences.

¹Public Resource Code, Sec. 21001 (b), (c).

² *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see Public Resources Code §§ 21002, 21002.1.

³ Guideline § 15126.6(a).

⁴ *San Bernardino Valley Audubon Soc'y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁵ Public Resources Code § 21081.5.



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 should you have any questions or concerns.

Sincerely,



Adrian Scott Fine
Director of Advocacy

