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Sent Electronically

Mindy Wilcox, Planning Manager
City of Inglewood
One West Manchester Boulevard, 4th Floor
Inglewood, CA 90301
Email: inglewoodtransitconnector@cityofinglewood.org

RE: Inglewood Transit Connector Project Draft Environmental Impact Report

Dear Ms. Wilcox:

On behalf of the Los Angeles Conservancy, I am writing to comment on the Inglewood Transit Connector Project Draft Environmental Impact Report (Draft EIR). We thank the City of Inglewood for including us in conversations regarding the proposed project's impacts to historic resources. While we are not opposed to the basis for this proposed project or an APM, we do believe the preferred project, as currently envisioned, entails that Inglewood's historic resources pay a great price and will be directly harmed as a consequence of this proposed project.

After reviewing the Draft EIR and following conversations with City staff and the project team, we remain concerned about the proposed construction of a forty-foot tall, automated people mover (APM) along Market Street and directly through the heart of Inglewood's downtown commercial district. The Draft EIR states the proposed project will activate and revitalize the Market Street commercial corridor as economic revitalization is one of the project objectives. However, the preferred project and undertaking may have the opposite effect for downtown, and result in an environment that will be detrimental to its long-term viability.

As presented, the APM will travel through Market Street and blanket the downtown in shadow. As specified in the historic resources report, the project will have significant direct impacts to several historic resources including the Fox Theatre and former Federal Building and Loan Association building.



The Fox Theatre, a National Register listed property, has been cited as having significant direct impacts caused by interrupted view sheds as a result of the construction of the APM. This is a highly-significant historic resource, built in the late '40s and designed by theatre architect S. Charles Lee. While we agree that this is a significant impact to the Fox Theatre, we believe the questionable economic viability of any rehabilitation project following the APM is a much larger concern, and the vacant theater will fall further into disrepair, if not potential demolition in the future.

A second historic resource, the California Register-eligible Federal Building and Loan Association building, will be demolished as part of the proposed project. Situated at the corner of Market Street and Manchester Avenue, the Federal Building and Loan Association building is an iconic Mid-Century structure (remodeled from earlier structure) and important corner building anchor to the downtown district. As planned, it will be removed to accommodate the necessary turn radius for the APM resulting in a significant impact.

The Conservancy believes the Draft EIR analysis is underplaying the full extent of direct and indirect adverse impacts that will result from the proposed project and APM. Based on our experience and historic precedents in other cities that have elevated APMs, the potential for a negative result is great. Inglewood's historic downtown Market Street commercial corridor will forever be radically altered as a result of this proposed project, leaving an environment that will be scarred and challenging to activate or repair in the future.

Unless we overlooked it in the Draft EIR, there does not appear any renderings or even detailed site plan analysis that conceptualize the APM in scope and three-dimensional appearance in downtown. Absent this information and in the abstract it is difficult for the public to understand what is being proposed and how this will visually impact the look and feel of the existing downtown environment. While we understand the exact details and scope of the APM may not be known yet, this omission needs to be remedied and included as part of the Draft EIR alternatives analysis so the public can be fully apprised of what is being proposed and provide informed input.

We believe the historic resource analysis needs to be revisited in its determination that other historic resources within the project area will not incur significant impacts. The scale and massing of the proposed project and APM will erode aspects of existing integrity, namely the feeling and setting of the downtown which is comprised of a series of identified individual resources, if not an entire historic district (see below). While we appreciate and value the introduction of design guidelines for downtown as a preservation planning and design review tool, as a mitigation measure this will not result in a less-than-significant impact. Further, we believe it will be largely negated if the APM is constructed as currently proposed.

I. Downtown's Market Street commercial corridor should be reevaluated as a potential historic district

In the cultural resource analysis for downtown Inglewood, the Historic Resources Group (HRG) found Market Street and the surrounding area not eligible as a potential historic district due to an overall loss of integrity. It would be helpful to see this detailed analysis as we believe a



potential historic district may exist along Market Street from Regent Street to Hillcrest Avenue. We strongly suggest this be reevaluated and a peer review analysis provided as part of this EIR process. The current downtown still maintains its Main Street scale and overall streetcar environment, despite some losses of buildings and storefront alterations (a common occurrence for many historic downtowns). As seen throughout traditional Main Street downtowns, storefront window systems often change, while massing, scale, and materiality of the overall facades remain intact. Because it was developed as a streetcar commercial corridor, the most important character defining features of Market Street is its overall scale which it retains.

There is only one downtown for Inglewood that represents the full breadth of the city's storied past and, as an independent historic resource, it will be significantly and adversely impacted by the proposed APM project. Once Market Street is reevaluated and, if found eligible as a potential historic district, the APM will have a far greater adverse impact on historic resources as a whole than determined in the Draft EIR. We strongly urge the City to address this request as part of its due diligence and responsibility through the California Environmental Quality Act (CEQA) process.

II. Additional preservation alternatives should be evaluated and considered

Market Street is the historic heart of Inglewood's downtown commercial district. Beginning in the 1920s, development moved west from Commercial Street (now La Brea Avenue) to Market Street along the Los Angeles Railroad trolley car route. By the 1930s the area was largely built out solidifying Market Street's place as Inglewood's downtown main street, meeting shopping and entertainment needs for the community. Following World War II Market Street began to face significant economic challenges as new commercial corridors and shopping malls stole customers from the once thriving downtown.

By constructing the APM through Downtown's Market Street the City will certainly create even more hardships for these operators rather than the benefits the Draft EIR touts. In a 2019 interview with *Curbed Los Angeles*, Mayor James T. Butts stated, "the goal is to make Market Street in the image of Old Town Pasadena."¹ If this remains the vision, the Inglewood Transit Connector Project and the APM seems to be in conflict with such goals.

As detailed in the Draft EIR, three alternative alignments would avoid Market Street completely yet each is dismissed as infeasible or not meeting project goals. This includes the following:

Alternative A: Market-Manchester Street Alignment (proposed Project)

Alternative B: Fairview Heights Alignment was found infeasible because of significant costs connected to utilities that currently run under the street surface and adverse impacts to the Inglewood Cemetery where the APM transitions from Florence Avenue to Prairie Avenue.

¹ "Can Inglewood Revive Market Street?" Curbed LA, 2019.
<https://la.curbed.com/2019/12/4/20976302/market-street-inglewood-development>



Alternative C: Arbor Vitae Alignment, which moves along Arbor Vitae Street would successfully meet intermodal transit objectives, but it would not contribute to the revitalization of downtown as it passes far to the south of the commercial district.

Alternative D: Century Boulevard Alignment, similar to Alternative C, this alignment would successfully meet project objectives for intermodal transportation. However, it was found infeasible because it would need to cross the I-405 and it does not meet project objectives for downtown revitalization.

In addition to the three alternative alignments, the City examined five project alternatives. Not including the No Project Alternative, Alternative 2: Bus Rapid Transit (BRT) System is the only alternative that offers a true project alternative. Alternative 3 maintains the current project with the addition of a pedestrian promenade along Market Street; Alternative 4 proposes one additional station on Manchester Boulevard; and Alternative 5 proposes a single station on Prairie Avenue. Alternatives 3, 4, and 5 all maintain the proposed elevated APM along the Market-Manchester Alignment.

As stated in the Draft EIR, Alternative 2 is the Environmentally Superior alternative. Because the BRT alternative would only require minor modifications to the existing streetscape, and this alternative would avoid all significant impacts to historic resources without demolishing the former People’s Federal Building and Loan Association building. Further Alternative 2 successfully meets all project objectives in their entirety or partially.

In addition to Alternative 2, the Conservancy believes another alternative may exist that could avoid the adverse impact to downtown and should be evaluated as part of an existing or new alternative within the Draft EIR. This includes routing the APM along Locust Street. It would bypass Market Street and potentially not result in the loss or any direct impacts to historic resources.

The existing surface parking lot at Market and Regent streets could accommodate the necessary turning radius of the APM. There is open space at the southwest corner of Regent and Locust streets that might allow for another turn for the APM without directly impacting the residential building at this site. While Locust is a narrower street than Market, it appears the APM could be accommodated and should be studied. Just as the City is considering a paseo or pedestrian mall treatment, this could also be considered for an alternative route for the APM down Locust Street. It could offer greater green space than currently exists in the area and could be welcoming to adjacent building tenants and nearby residents. At Locust and Manchester streets, the APM turning radius would impact the McDonald’s building, however this is not a historic resource and would avoid a significant impact. This is an alternative we think needs to be fully evaluated, studied and considered within the Draft EIR.

A key policy under 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.”² To this end, CEQA “requires public agencies

²Public Resource Code, Sec. 21001 (b), (c).



to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”³ 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.⁴ Reasonable alternatives must be considered “even if they substantially impede the project or are more costly.”⁵ Likewise, findings of alternative feasibility or infeasibility must be supported by substantial evidence.⁶

The Conservancy strongly urges the City to reevaluate these alternatives as part of a comprehensive alternative route study, given CEQA’s requirement to fully analyze alternatives and reduce impacts to historic resources where possible. This new information should be provided either as a supplement or revised Draft EIR, allowing the public to better understand and comment on the full range of impacts and provide input prior to any issuance of a Final EIR.

III. The proposed project will have significant impacts on aesthetics

The Draft EIR’s aesthetics analysis and report concludes that no significant visual impacts will occur to downtown’s Market Street. To imply a forty-foot tall APM with large concrete pylons constructed in the middle of the street will have no significant visual and aesthetic impacts on a low scale streetcar commercial corridor is problematic within the EIR. We believe this to be inaccurate and flawed analysis.

As described in the Draft EIR, the APM construction closely resembles that of a freeway or bridge construction above and hovering over Market Street. Not only will pylons create a visual impairment along the center of Market Street but the platform upon which the APM tracks sit will convey a similar feeling to walking under an overpass. While we understand the width of the APM may range in scope and is not entirely known yet, the aesthetic analysis should not underplay the full impact of this undertaking as it will profoundly and directly impact the downtown environment, its overall visual aesthetics, and vehicular and pedestrian flow.

We strongly suggest a peer review or completely reevaluating the aesthetic impacts in the EIR, as either a supplement or revised Draft EIR, allowing the public to better understand and comment on the full range of impacts, providing input prior to any issuance of a Final EIR.

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

⁴ Guideline § 15126.6(a).

⁵ *San Bernardino Valley Audubon Soc’y v. County of San Bernardino* (1984), 155 Cal.App.3d 738, 750; Guideline § 15126(d)(1).

⁶ Public Resources Code § 21081.5.



IV. If federal funds are used in the proposed project the City must adhere to Section 106, NEPA and Section 4(f)

Should the proposed project use federal funds for construction it must comply with multiple environmental review processes in addition to CEQA that establish different standards for thresholds and the identification and protection of cultural resources, including thoughtful assessments of potential impacts and alternatives analysis. This includes Section 106 of the National Historic Preservation Act (NHPA), the National Environmental Policy Act (NEPA), and Section 4(f) of the Department of Transportation Act.

At this time, the Conservancy is uncertain whether or not federal funds will be used. However, if employed, the current environmental review process will need greater scrutiny and fully adhere to these additional environmental review procedures. We want to ensure both the CEQA process and any others needed are relying on analysis that fully and accurately portrays the direct and indirect impacts, as well as a range of alternatives that can be evaluated and considered. Otherwise this will slow the review process considerably.

V. Conclusion

The Conservancy remains concerned by the City of Inglewood's desire to move forward with the proposed project, Alternative A. We believe that the Inglewood Transit Connector Project and APM outcome will result in multiple identified and unforeseen adverse impacts to downtown's Market Street corridor. This includes impacts to aesthetics, multiple historic resources, and the long-term economic viability of Market Street's commercial corridor.

Recommendations:

- Provide renderings and detailed site plan analysis that conceptualize the APM to ensure the public fully understands what is being proposed and how this will visually impact the look and feel of the existing downtown environment.
- Reconsider alternative routes as a means of finding a solution that will result in less-than-significant impacts to downtown and its historic resources.
- Reevaluate downtown Market Street as a potential historic district.
- Reevaluate aesthetic impacts of the project on downtown.
- Ensure the CEQA process is considered and followed as part of larger federal environmental review process should funding be accessed for the project soon, including Section 106 of the National Historic Preservation Act (NHPA), the National Environmental Policy Act (NEPA), and Section 4(f) of the Department of Transportation Act; and,
- Based on necessary additional analysis and evaluation of project alternatives, a supplemental or revised Draft EIR should be provided, allowing the public to better understand and comment on the full range of impacts, providing input prior to any issuance of a Final EIR.
- Convene the public and ensure various stakeholders are fully aware of what is being proposed to ensure input and multiple viewpoints are provided as part of the process.



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
Senior Director of Advocacy

