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Via email 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

January 17, 2023

RE: Los Angeles Aerial Rapid Transit (LA ART) DEIR Comments
SCH 2020100007

Dear Mr. Zelmer:

This letter is submitted on behalf of Latino Outdoors (LO) -- a national organization of 200+ volunteers currently operating in over 30 regional locations across the United States. Our mission is to inspire, connect, and engage Latino communities in the outdoors and embrace our *cultura y familia* as part of the outdoor narrative, ensuring our history, heritage, and leadership are valued and represented.

As an organization, we value our relationship with our community and serve as a voice in promoting diversity, inclusion, access, equity and social justice in the outdoors. For the last 10 years, we have grown a strong and trusting relationship with California State Parks, and we continue to enjoy a mutual commitment and partnership for expanding access and equity for all Californians to our State's most treasured beaches, parks and historic monuments.

In recent years, Los Angeles State Historic Park (LASHP) and its staff have hosted many LO events including a national NOLS Outdoor Wilderness Training Session and campout, evening campfire programs and several State Parks/Latino Outdoors interpretive hikes, Cradle LA events and community programs. As it is currently proposed, we believe that the LA ART project poses a serious threat to the LASHP, especially if the project's developer and supporters impose their political will to require California State Parks to amend the park's General Plan.

On June 10, 2005, the California State Park and Recreation Commission approved and adopted the General Plan and Environmental Impact Report for LASHP. In the plan's opening statement, park planners and commissioners shared a vision for LASHP. They described it as having a unique "Sense of Place". Their statement begins with the words...

"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."

Key elements of the LASHP's General Plan include a Declaration of Purpose and Vision created by the California State Parks General Plan team.

Declaration of Purpose

"The purpose of Los Angeles State Historic Park is to provide the public with a place to learn and to celebrate the ethnically diverse history and cultural heritage of Los Angeles, with an emphasis on its evolution to an economic and industrial metropolis of the 21st Century with extraordinary influence throughout the world. The Park will contribute to the emerging Los Angeles River Greenway, stretching from the San Gabriel Mountains to the Pacific Ocean. The Park will bring a wide range of visitors together to examine and experience the complete story of Los Angeles. It will be a sanctuary from the dense, urban environment that surrounds it. The Park will connect abstract historical and social patterns to the personal experiences of Angelenos and visitors from the city, the state, the nation, and the world." (LASHP General Plan, page 82, section 4.1)

Vision

"Visitors to Los Angeles State Historic Park will enjoy a rejuvenating respite from the surrounding urban landscape in an expansive open space. The Park will be a desirable destination and important point of interest. Visitors will experience the environment through interpretive media and landscape features that recall the historical events of the region. Educational programs and activities will appeal to the interests of many visitors, from the local to the global community, will be varied in media, scope and diversity, and will emphasize the City of Los Angeles' cultural, historic, and commercial heritage." (LASHP General Plan, page 83, section 4.2)

If not for the collective vision of the Cornfield Advisory Group, the California State Parks planning team and local community supporters, our LO volunteers would not be able to bring local area youth and families to LASHP to enjoy the park's unencumbered open-space, its shaded paths, informal picnic areas, and the amazing views of downtown Los Angeles, with the backdrop of the San Gabriel Mountains.

It is our belief that the LA ART project would permanently alter the core values of the Park's General Plan, including its Declaration of Purpose and Vision. Yet the Draft EIR (DEIR) fails to describe this impact. In particular, on page 58 of the DEIR Executive Summary, Land Use and Planning element, LUP-2, the report asserts that the preferred project (ES2 Proposed Project) Environmental Impacts shall create "Significant Impact" on LASHP and the project is in conflict with the current LASHP General Plan. Yet the DEIR suggests that the only "mitigation measure" needed to reduce the project's impact to the park under the category of Potential Environmental Impacts – LAND USE AND PLANNING would be to (LUP-A) "Obtain a Los Angeles State Historic Park General Plan Amendment. Pursuant to Public Resources Code 5002.2, the proposed Project shall obtain an amendment to the Los Angeles State Historic Park General Plan to allow transit uses within the Los Angeles State Historic Park General Plan." The DEIR goes on to assert that by doing so, the project proponents will reduce the project's significant impact to a "Less Than Significant Impact with Mitigation".

So rather than identifying potential detailed and specific impacts on the park (archeological/cultural, environmental, historic, viewshed, visual, etc.) and suggesting mitigations, the DEIR merely notes that the process of a granting a general plan amendment would reduce impacts from significant to less than significant 'with mitigation.' This tactic shifts the burden of identifying all potentially significant impacts (visual, noise, visitor access, pedestrian and parking, acceptable transit options, use of public airspace and others) from the project applicant onto the shoulders of California State Parks staff, the California State Parks and Recreation Commission, and to the public. This is unacceptable and incompatible with California Environmental Quality Act (CEQA) project review process and mitigation, and it sets an indefensible precedent for granting a private developer access and use of State resources entrusted to the State by its residents.

As currently proposed, the LA ART project is viewed by our community as just another environmental justice veiled attempt to degrade land that was hard fought and promised to be "The Central Park of LA" for seven generations of Californians and beyond. Recognizing the need for greenspace in LA's urban area, three great environmental warriors dedicated their lives to finding a way to create an open-space oasis in the industrial/commercial wasteland of northeast Los Angeles. The work of the late Robert Garcia (The City Project), Theodore "Ted" Jackson (CA State Parks Deputy Director for Operations) and Ron Shaffer (CA State Parks LA District Superintendent), now all diseased, must not be forgotten – but cherished, protected and preserved.

We urge you to reject the DEIR's faulty premise that California State Parks should be expected to mitigate the many obvious significant project impacts by hastily adopting a revised General Plan Amendment that ignores and papers over clear conflicts between the project and park's current General Plan. On behalf of our LO community and current and future park users, we urge you to instruct the project proponent to properly identify, analyze, and mitigate all park impacts as required by law, and not usurp their legal responsibility to provide a clear, thoroughly complete and defensible project DEIR.

A failure to do so, only reinforces our belief (as well as the majority of local community members) that a privately financed and constructed aerial tram tourist attraction should never be built inside and over Los Angeles State Historic Park.

Respectfully,



Richard A. Rojas, Immediate Past-Chairperson
Latino Outdoors – Advisory Board



Taken during Dedication of Corn Field Property (from left to right) are Sean Woods and the late Theodore "Ted" Jackson, Robert Garcia and Ron Schaffer.