



January 17, 2023

VIA EMAIL LAART@metro.net

Cory Zelmer
Deputy Executive Officer
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Mail Stop 99-22-6
Los Angeles, CA 90012

Re: Comments on LA ART Draft EIR dated October 2022

Dear Mr. Zelmer:

The Sierra Club submits this letter to set forth its comments and concerns regarding the LA ART Draft EIR.

Executive Summary (“ES”) 1 Introduction: At the outset, LA Aerial Rapid Transit Technologies LLC is identified as the Project Sponsor. While neither the ownership or management of this LLC is specified in the Draft EIR, we understand from news reports¹ and multiple other sources that the project is promoted by Frank McCourt, who in turn is a 50 percent owner of the Dodger Stadium Parking Lot.

The Introduction sets forth the conclusion that Metro is the “lead agency” and as such has the authority to approve the project and implement mitigation measures. However, significant concerns have been raised by The California Endowment and the LA Parks Alliance that Metro is not in fact the appropriate “lead agency” for the LA ART, particularly as the proposed project for the stadium parking lot is private in nature. Rather, the City of Los Angeles is the appropriate lead agency on the basis of its general governmental powers and its direct accountability to its constituents. We concur with these concerns and particularly express concerns with the dedication of Metro’s employees and significant resources to this private project.

¹ *Challenges Loom for gondola to Dodger Stadium planned for 2028 Olympics*, LA Times 1/9/23; *LA’s Transit Infrastructure Can Always Get Dumber: Meet the Gondola* (<https://knock-la.com/las-dumb-gondola/>)

ES 2 Project Purpose/ES 5 Project Overview: There is significant doubt as to whether the LA ART would alleviate congestion and air pollution, which in turn is a fundamental premise of the Draft EIR. The UCLA Mobility Lab Study dated October 24, 2022 concludes the gondola will do little to reduce traffic and green-house gas emissions. We concur with the concerns raised by the study. The study also casts significant doubt on the Draft EIR Section 1.0 conclusion that LA ART is an “environmental leadership transit project” that is in turn entitled to streamlined judicial review.

In particular, the multiple Draft EIR references to the “5,000 people per hour” gondola capacity are refuted by the UCLA Mobility Lab Study. The Draft EIR further assumes patrons would use the gondola both before and after events.² However, the study (and common sense) indicate that many stadium attendees are not likely to wait for the gondola following games and concerts and will instead use the express bus or ride share services back to LAUS or to other destinations. Moreover, the “5,000 people per hour figure” gondola capacity figure does not reflect non-event day or off-season usage. The UCLA Mobility Lab Study concludes very few people would use the gondola as a form of transportation outside of travel to/from games.³ Any discussion in the Draft EIR relating to gondola ridership and the estimated reduction in vehicle miles travelled must take these two factors into account.

The Draft EIR is also incomplete and lacking in transparency in that it is focused solely on the gondola. Neither the Purpose nor Project Overview discussions address commercial developments apparently contemplated by Mr. McCourt for the stadium parking lot or how the parking lot might ultimately be reconfigured to allow commercial development.⁴ We concur with the concern that the gondola is essentially a private project that is proposed to be built using public resources and over public rights-of-way and publicly owned property. The failure to address commercial development of the parking lot and resulting increase in traffic and greenhouse gas emissions from development renders it impossible to evaluate the overall impact of the proposed project on traffic and greenhouse emissions. Consequently, the conclusions on ES page 53 and elsewhere in the report that construction and operations of the LA ART would have a “less than significant impact” on greenhouse gas emissions are not supported.

Moreover, the LA ART does not serve any broad public purpose. The suggestion that the gondola might possibly serve communities near LAUS and Dodger Stadium is not persuasive. These communities are within walking, biking, or Dash bus ride distance of LAUS, State Historic Park and the Stadium. The communities may also be served by the Metro Micro on-demand rideshare service that is already operating in many other Los Angeles communities including the Highland Park/Eagle Rock/Glendale service zone.

² This flawed assumption is carried through in the report’s 2026 projection of 6,000 riders and 12,000 round trips and the 2042 projection of 10,000 riders and 20,000 round trips.

³ Excepting employees, Dodger Stadium is nearly empty on days when there is no game or concert. Park goers have found their way to Elysian Park for decades without a gondola.

⁴ This lack of detail on the critical topic of commercial development contrasts with other topics that are covered in excruciating detail.

The Draft EIR highlights gondolas operating in various foreign countries such as Bolivia and Mexico, but it does not describe the Portland Aerial Tram or NYC's Roosevelt Island Tramway. The Portland Aerial Tram is actually operated for the public benefit, i.e., primarily for patients, students and staff commuting year-round between two Oregon Health and Sciences University locations and incidentally for the general public.⁵ Similarly, the Roosevelt Island Tramway provides daily commuter transportation between Roosevelt Island and the Upper East Side of Manhattan and primarily serves workers. The Portland and Roosevelt Island tram services can serve as templates for Los Angeles's broader public purposes such as transportation to our major year-round employment centers, medical facilities and already existing year-round entertainment/cultural centers *and* reduction of greenhouse gas emissions.

ES 7 Proposed Project Alignment - Impact on State Historic Park and Views:

The City of Los Angeles should jealously guard and preserve the jewel that is State Historic Park rather than permit the diminishment of this public open space.⁶ The construction and operation of the Chinatown/State Park station on park land is at complete odds with these goals of protection and preservation. The Draft EIR contemplates at Section 2.9.4 that the Chinatown/State Park Station would have a footprint of 2,605 square feet including 2,195 square feet within the southernmost part of State Historic Park.⁷ Further, the station canopy would have an overhang of 9,320 square feet over the park. Eighty-one trees would need to be removed (including 75 from the park and six from the public right-of-way adjacent to the park) with an unspecified number of trees to be replaced. The station would thus encroach on the park and eliminate a significant amount of park space and open sky view. This assumes LA ART is able to obtain the requisite approvals from the California Department of Parks and Recreation for the proposed uses.⁸ Such approval is not feasible, as state park historic units may only include facilities that "are required for the safety, comfort, and enjoyment of the visitors, such as access, parking, water, sanitation, interpretation, and picnicking."⁹ A gondola boarding station and tower are not required for these park visitor purposes.

The Draft EIR notes that one of the principles in the Park's General Plan is to "Promote a 'Touchstone Landscape' for Reflecting on Los Angeles' Natural and Cultural Heritage" by making the Park a place of inspiration, reflection and appreciation of history and nature through the interpretation of the Los Angeles River."¹⁰ Installing a massive gondola tower and station within State Historic Park for a sports stadium destination does not comport with

⁵ See gobytram.com for information on Portland's tram service.

⁶ Likewise, the City should focus on preserving the El Pueblo de Los Angeles Historical Monument (also a State Park) and not permit the construction and operation of the Alameda Street terminal adjacent to this historical monument, Olvera Street and associated architectural structures.

⁷ Elsewhere the Draft EIR only indicates that the Chinatown/State Park Station would be constructed "partially" within the park boundaries without specifying the square footage.

⁸ Draft EIR Section 2.10.

⁹ Cal. Public Resources Code section 5019.59.

¹⁰ Draft EIR Page 3.4-3.

this inspirational principle. Rather, it is an abuse of public land designated for this historic purpose and for open space values.

We also disagree with the Draft EIR conclusions that the LA ART “would not substantially degrade the existing visual character or quality of public views . . . of the site and its surroundings and the impact would be less than significant”, particularly as these conclusions apply to State Historic Park, the Broadway Junction and Dodger Stadium.

The proposed Chinatown/State Park Station and massive three level, 98-foot tower at the station are completely at odds with the existing park entrances, landscaping, layout and amenities, which provide pedestrians and bicyclists with a beautiful, restorative atmosphere. The proposed station and the 98-foot tower would detract from the park’s stunning views of the downtown skyline¹¹ to the south and the San Gabriel and San Bernardino Mountains to the north. The Draft EIR authors concede at Page 3. 1-43 that the “Chinatown/State Park Station is a new and large visual element in the landscape, and views of residents would already be altered noticeably”. The report’s authors go on to suggest at Pages 3. 1-43 and 3. 1-46 that the noticeable alterations created by the station would not be so bad because residents and park goers would be compensated by a “potential” mobility hub, 740 square feet of new concessions, restrooms, landscaping and hardscaping, pedestrian improvements and “potential” seating. But this is no consolation at all because State Historic Park already offers *all of these features* including an in-park restaurant and many other restaurants easily within walking distance. The suggestion that the park’s scenic views should be compromised for a little more landscaping and hardscaping in a beautifully landscaped/hardscaped 32-acre park is not persuasive. Likewise, the Draft EIR suggestion at page 3.1-45 that “existing views of downtown from within the park are already interrupted under existing conditions by trees and intervening development” does not justify the additional massive and continuous gondola interruptions proposed by LA ART (assuming for purposes of argument only that trees constitute an interruption of the view).

Even though the Chinatown/State Park Station is proposed to allow passenger boarding, the Draft EIR makes no reference to parking for passengers boarding at the station. State Historic Park is already served by the Metro Chinatown station (located within yards of the park’s beautiful main entrance!) and nearby LAUS and thus the park would not benefit much from the proposed boarding station.¹²

Moreover, the proposed alignment of the gondola directly over a long stretch of State Historic Park (and thus over park goers) and directly over and past private residences is invasive and contrary to current recreational and residential uses. The Draft EIR indicates cabins near the Broadway Junction would “be constantly moving in and out of view”¹³ and

¹¹ As noted in Section 2.3.4 of the Draft EIR, “[v]iews of the downtown Los Angeles are available from the majority of the Site.”

¹² State Historic Park and the nearby Mission Junction neighborhood would benefit from the addition of one or more pedestrian crosswalks across North Spring Street, a far less expensive and invasive solution than the gondola.

¹³ Draft EIR Page 3. 1-48.

could be seen from residents and yards and from inside their residences. The resulting disturbance and intrusion to park goers and nearby residents would persist during construction and year-round, daily gondola operation.

The proposed 179-foot Stadium Tower and massive 37,000+ square foot Dodger Stadium Station are completely at odds with the character of Elysian Park¹⁴ and the Stadium's peaceful park setting.¹⁵ The Draft EIR does not in our view adequately address any of the foregoing concerns.

ES 8 System Operations; Costs?: The Draft EIR does not specify how construction or post-construction operating, security, maintenance costs and power costs would be funded and paid, even though it is specified that all these elements would be required for proposed daily operation. Apparently, this lack of specificity arises because financing has not been fully worked out.¹⁶ This of course raises the issue of whether taxpayers will end up footing these year-round costs for the McCourt family's private gain.

ES 11 Alternatives to Reduce Significant Impacts: We concur with the Draft EIR in one respect, namely, the TSM Alternative, which contemplates enhancing the Dodger Stadium Express Service, is the Environmentally Superior Alternative, particularly when operated with zero emission buses.

However, the TSM Alternative is not addressed adequately in the Draft EIR. No doubt the existing Express Service can be expanded in size and staging locations. The operation of the massive Park and Ride and Bowl Shuttle bus service between the Hollywood Bowl and various sites in the city during the concert season (including bus only lanes) demonstrates the viability of expanding the Dodger Express Service.

Moreover, the development of an off-site loading facility for the TSM Alternative would be far less disruptive to State Historic Park and surrounding communities than the LA ART. In fact, the TSM Alternative would not have any impact on the park. As for bus lanes, Cesar Chavez and Broadway lane closures and diversions are already utilized on game days and expansion of such lanes appears viable. The LA Zoo parking lot provides an excellent bus loading/unloading location.

The Spring Street Alignment, which contemplates the construction of a gondola station within Historic Park, is mentioned as an alternative. This alignment is unacceptable in our view, as it would destroy part of this refuge that was over 17 years in the making and block part of the open sky above the park.

¹⁴ As described in Section 2.3.1 of Draft EIR, Elysian Park is the oldest and second largest park in the City.

¹⁵ Tommy Lasorda nicknamed the stadium "Blue Heaven on Earth." https://en.wikipedia.org/wiki/Dodger_Stadium.

¹⁶ "It remains unclear how LA ART will be funded, or how much of the price tag will be passed onto taxpayers through Metro's sponsorship." *LA's Transit Infrastructure Can Always Get Dumber: Meet the Gondola* (<https://knock-la.com/las-dumb-gondola/>); "Gondola operations would likely be funded largely by corporate sponsorships and tourist fares, said Nathan Click, a spokesperson for the group [Climate Resolve]. But the financing plan is still being worked out." <https://www.latimes.com/california/story/2023-01-09/challenges-loom-for-gondola-to-dodger-stadium-planned-for-the-olympics>

Other transportation related alternatives that would serve to conserve energy and reduce green-house gas emissions are (i) the construction of solar panels in the stadium parking lot, (ii) the addition of electric vehicle charging stations and bike share facilities in the lot and (iii) the expansion of the Dash bus service to Elysian Park and State Historic Park. These alternatives are not mentioned in the Draft EIR, which apparently was drafted to present the gondola as the only option. It is not.

ES 12 Design Options: Design and Use Option E, contemplating the construction of a pedestrian bridge in Historic Park, is attractive but clearly may be accomplished without construction of the gondola.

ES 13 Summary of Environmental Impacts: Contrary to this summary, the proposed 98-foot tower at the Chinatown/State Park Station would in fact block and degrade part of the scenic vista and view of the downtown skyline that is observable from Historic Park.

In sum, the Draft EIR is incomplete and inaccurate in significant respects and lacking in transparency. It misrepresents the potential impact of the LA ART on ridership and the reduction of greenhouse gas emissions. There are better and less intrusive ways to transport people to and from Dodger Stadium, Elysian Park and surrounding communities while also preserving and even improving State Historic Park and these communities. Any gondola built within the City of Los Angeles must serve a much broader public purpose than moving passengers between LAUS and Dodger Stadium.

We welcome the opportunity to meet with you to discuss these concerns.

Sincerely,



Chair, Central Group (Los Angeles)
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Sierra Club

Copies:

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