



January 17, 2023

**VIA EMAIL**

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

**Re: SCH #2020100007 Los Angeles Aerial Rapid Transit Project**

Dear Mr. Zelmer:

I am writing on behalf of Homeboy Industries in response to the Draft Environmental Impact Report (DEIR) issued by your agency for the proposed gondola from Union Station to the Dodger Stadium parking lots.

Homeboy Industries stands to be one of the most heavily impacted community stakeholders if the gondola is allowed to proceed as proposed. We will be affected with significant unmitigated environmental impacts during construction and by permanent effects on our operations.

We refer you to our letter to Metro dated November 16, 2020 for a detailed enumeration of our original concerns. While we concur generally with other community stakeholders in their current comments on the DEIR, we would like to point out the following areas of specific concern to Homeboy.

First of all, the document refers to Homeboy Industries as an "office building." The DEIR assesses potential environmental impacts against standards applicable to commercial structures. Homeboy Industries is, in fact, much more than an office; it is a highly-venerated, community-based non-profit that is the largest gang rehabilitation and re-entry program in the world. We provide training and support for thousands of formerly gang-involved and previously incarcerated people, allowing them to redirect their lives and become contributing members of our community.

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**Hope has an address.**

130 W. Bruno Street, Los Angeles, CA 90012 | Phone: (323) 526-1254 | [homeboyindustries.org](http://homeboyindustries.org)

Many of our activities take place in and around our headquarters campus at 130 Bruno Street in Los Angeles. Any analyses of the potential impacts from the gondola should take into consideration the many community meetings, job training activities, spiritual counseling and other activities that take place at this location. It is truly a "sensitive receptor." In the near future we also hope to provide transitional housing for some of our clients on this site.

Following the outline of the DEIR, we note these areas of greatest concern:

### **1. Project Description**

Because of the scale of drawings, it is difficult to ascertain whether the proposed project would require an aerial easement or easement buffer on Homeboy's current premises. Could you provide a larger scale drawing depicting where these zones might impinge.

### **2. Hope Village - Housing & Service Expansion in Support of Alternatives to Incarceration**

Homeboy Industries is working to alleviate the housing crisis in Los Angeles and has plans to develop transitional and permanent supportive housing on land where the proposed Alpine Tower is located. Developing affordable housing and expanding our campus will support broader public and private partnerships to create "Hope Village" as an alternative to incarceration (ATI) anchored by a care first, jails last paradigm. Insofar as we can determine, the location of the gondola's Alpine Tower would significantly impair our ability to deliver housing to our clients and respond to the "State of Emergency" currently in place at the County and City levels in response to the homeless crisis; and serve as an impediment to "Hope Village" as a critical ATI strategy.

### **3. Aesthetics**

Analyses in the DEIR of visual impacts from the gondola seem to completely ignore Homeboy Industries, which operates one of the key facilities in the gondola's path. There is no doubt that a 195-foot high, awkwardly-shaped concrete tower will have a serious and permanent - and most would say incompatible - visual effect on Homeboy Industries' operations. At the very least, your analysis of Landscape Unit 3 (page 3.1.22) should describe and discuss these impacts on Homeboy Industries in particular.

Further, most CEQA analyses include a Shade and Shadow study. One would be appropriate for this project as well.

### **4. Noise and Vibration**

Analyses of these potential impacts correctly conclude that some significant impacts cannot be mitigated. We presume you will be seeking a Statement of Overriding Considerations to accept these impacts, at our expense.

With regard to noise, we are identified as NSR-7 in your analysis. We are projected to experience noise levels at 80.3 dBA during construction, 10.5 dBA higher than current ambient noise levels, described in your exhibit as sounding like a "garbage disposal at 3 feet." You deem this tolerable for an office building. As noted above, we conduct far more than just typical office activities, and invite many members of the public to our site. You note that even 75 dBA is "clearly unacceptable," even for office use, and that 65 dBA is "normally unacceptable" (page 3.13.48).

In the analyses of potential vibration impacts, Homeboy Industries is VSR-11, but is not called out as a Measurement Location. Therefore, no specific information about the impacts of drilling (or driving) 120-foot deep (sic) piles adjacent to our training rooms, kitchen and restaurant is provided. Nonetheless, the DEIR concludes that Homeboy Industries would experience significant “annoyance” from vibration, even with mitigation, during construction (page 3.13.63). A more detailed and site-specific analysis of the vibration impact on our buildings and operations would be appreciated.

## **5. Transportation**

Perhaps the largest credibility gap in the DEIR concerns automobile access and parking. It seems inconceivable that the proposed project would have no significant impact on either.

Clearly, potential construction period impacts would be manifold. We would like to see focused analyses of the impacts of proposed road closures on local streets including Alameda, Bruno, Alpine and Main.

Also, there is no explanation in the DEIR about where visitors to the gondola might park in our neighborhood and what the impact of moving “game day” traffic to Chinatown and its environs might cause. The traffic study in the DEIR seems purposefully oblivious to potentially severe impacts on automobile access, circulation and parking.

## **6. Impact on Our Business Revenue**

Homeboy Industries operates several social enterprises from its Bruno Street Campus including the Homegirl Café, Homeboy Merchandise, and the Homeboy Bakery. We rely on these businesses to create jobs for our clients and generate revenues in support of our mission. Each of these businesses are dependent on customer foot traffic and unimpeded vehicular access. For reasons aforementioned we have significant concerns regarding the revenue impact on our businesses.

## **7. Financing & Use of Public Funds**

We remain unclear as to how the gondola project will be financed, including the use of public funding to support the gondola’s construction. We will have significant concerns with any use of public funding that would defray resources from housing and other essential services for communities in need. As of the submission of this letter, transparency related to short and long term financing of the gondola project remains elusive.

## **8. Other Considerations**

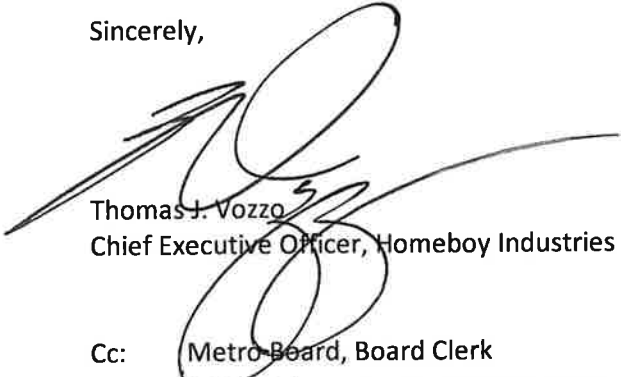
In addition to these CEQA-related concerns, we would like to raise two additional points.

First, we are clearly concerned about the permanent effects that the gondola might have on our sensitive, human-serving operations at 130 Bruno Street and on our future growth – even on the viability of our operations at this location - if the project goes ahead as proposed. These longer-term operational and economic considerations should be discussed now, but the CEQA process may not be the best forum for resolving them.

Second, there is a perception in our neighborhood that the gondola is being proposed as a precursor – “pre-mitigation” perhaps – to larger plans for development on the stadium parking lots. While these

plans are not in our purview to address now, we do believe that further development around the gondola end-station would exacerbate the environmental concerns we are considering at this time, and should be brought into play as part of this evaluation.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'T. Vozzo', is written over the typed name and title.

Thomas J. Vozzo  
Chief Executive Officer, Homeboy Industries

Cc: Metro Board, Board Clerk  
Los Angeles City Mayor Karen Bass  
Fr. Gregory Boyle, Founder, Homeboy Industries  
California State Assembly Member Wendy Carrillo  
Steve Delgado, Chief Operating Officer, Homeboy Industries  
Los Angeles City Councilmember Eunisses Hernandez, City District 1  
Martha Jimenez, Executive Vice President/General Counsel, The California Endowment  
Dr. Robert Ross, CEO, The California Endowment  
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